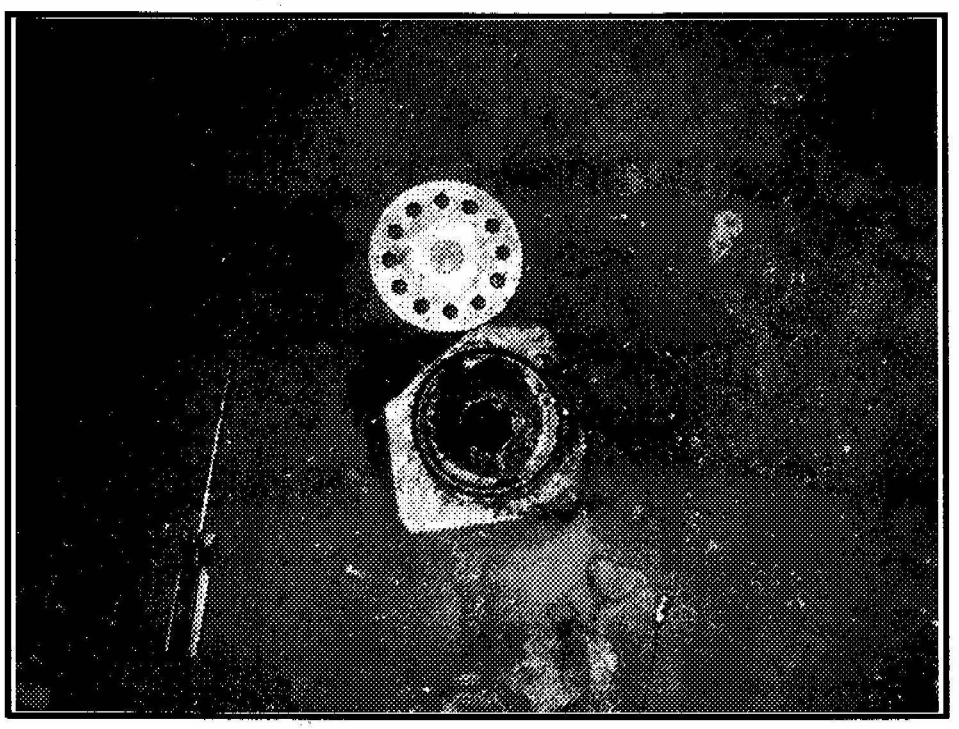
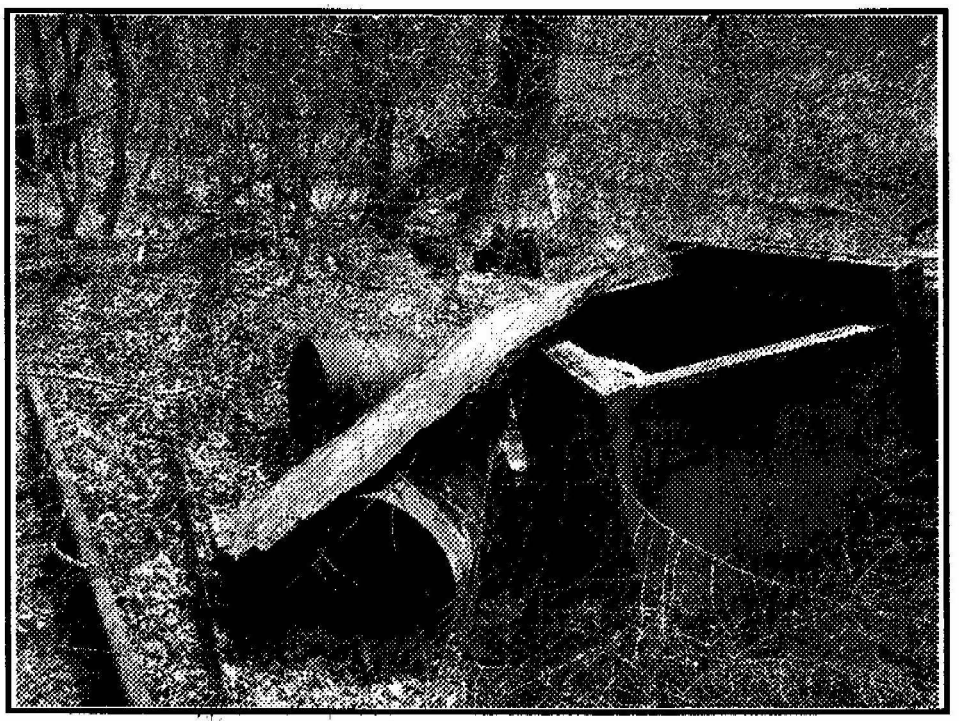
11. Transmissions and soil staining at SS-1 sample location. The in-ground scale is to the right.

12. Floor staining in the garage building.



13. Floor drain in garage building.



14. Barrels observed on the adjoining site to the east.

APPENDIX 3

RESOURCE INFORMATION

REGULATORY CONTACTS, PERSONS INTERVIEWED, AND HISTORICAL SOURCES

SOURCE	INFORMATION/CONTACT
Environmental Data Resources, Inc. (EDR)	Regulatory Database Search Radius Map with GeoCheck® April 26, 2004
Sanborn Fire Insurance Maps	1922, 1934, 1944 – EDR
City Directories	1967, 1971, 1978, 1982, 1984, 1990, 1996, 2000 – Maine Historical Society
Aerial Photographs	1940, 1964, 1975, 1998 – USDA Cumberland County, Maine
Other Sources	Mr. Joseph Kittrell, owner Mr. Denis Dancoes, real estate agent Windham Historical Society Windham Assessor's Office Mr. Roger Timmons, Code Enforcement Officer Mr. Charles Hammond, Windham Fire Chief Portland Water District

APPENDIX 4

ASSESSOR QUALIFICATIONS

Aaron R. Martin, B.S.
Environmental Scientist

PROFILE

Aaron Martin recently began his career with Jacques Whitford as an Environmental Scientist. Studying at the Iowa Lakeside Laboratory, in conjunction with The University of Iowa; Aaron worked with his professor and four other students, to complete an wetland delineation project for a parcel of land bordering Lake Okoboji. After graduating from The University of Iowa with a B.S. in Environmental Science he was the environmental science, biology, and chemistry tutor for the student athletes at The University of Iowa. Mr. Martin also served as an intern for the U.S. Fish and Wildlife Service as a Conservation Associate at the Connecticut River Coordinator's (CRC) Office in Sunderland, Massachusetts. As an intern, he assisted the CRC staff coordinating federal, state, and private interests for the cooperative migratory fish restoration program in the Connecticut River Watershed. Aaron has also been a HVAC apprentice for Martin Heating and Cooling, and manager for Martin Oil Wholesale fuel oil in Boone, Iowa.

EDUCATION

The University of Iowa, *Iowa City, IA*
B.S., Environmental Science, 2001

TRAINING AND CERTIFICATION

OSHA 40 Hour Hazardous Materials Operation Training, 2004

CAREER SUMMARY

Jacques Whitford Company Inc., *Portland, ME* *Environmental Scientist*	2004 - Present
U.S. Fish and Wildlife Service, *Sunderland, MA* *Conservation Associate*	2003 - 2004
University of Iowa Student Athletic Services, *Iowa City, IA* *Environmental Science Tutor*	2002

David V. Chapman, C.G.
Geologist

Profile

Mr. Chapman is a hydrogeologist with more than ten years environmental consulting experience in Maine. Mr. Chapman has a bachelor's degree in geology from the University of Maine at Orono and a Master's Degree in environmental engineering from Northeastern University. He currently manages six environmental sampling projects for the Maine DEP. Mr. Chapman has extensive experience assessing and remediating contaminated sites.

Education

Northeastern University
M. S. Environmental Engineering, 1987

University of Maine
B. A. Geology, 1978

Career Summary

Jacques Whitford Company, Portsmouth, NH
Hydrogeologist 1996 - Present

Caswell, Eichler & Hill, Inc., Portsmouth, NH
Hydrogeologist 1992 - 1996

Nobis Engineering, Inc.
Environmental Engineer 1991 - 1992

Acheron, Inc.
Hydrogeologist 1986 - 1991

Training and Certification

40-Hour OSHA Health and Safety Training, 1983
OSHA 8-hour Refresher, Annual
OSHA Supervisor Course,
Asbestos Building Inspector's Course, 2000
Maine-licensed Site Evaluator #293, 1990

D. Todd Coffin, C.G.
Senior Hydrogeologist

Profile

Todd Coffin is a Senior Environmental Geologist with Jacques Whitford and has fifteen years of consulting experience. Todd has managed numerous projects involving the investigation and remediation of contaminated sites. He has performed feasibility studies of remediation alternatives, conducted pilot testing and has designed and implemented full-scale remediation systems. In the mid-1980's, Todd worked for a consulting firm in Houston, Texas where he served as project hydrogeologist for the Koppers Cavalcade Superfund site. Todd returned to New England in 1 987 where he spent two years conducing contaminated site investigations and remediation in the Boston area for such clients as Shell Oil, Boston University, Avco Research Laboratory and several developers.

Education

Purdue University
M.S. Engineering Geology, 1986
Standard Oil/Shell Research Fellow, 1985

Colby College
B.A. Geology, 1983
Geology Department Prize, 1980; Dean's List; Independent Study Honors, 1983; Distinction in Major, 1983; Donald P. Lake Award, 1983.

Career Summary

Jacques Whitford, Inc., *Portland, M* *Senior Environmental Geologist*	1992 - Present
Haley & Aldrich, Inc., *Scarborough, ME* *Senior Environmental Geologist*	1987 - 1992
McBride-Ratcliff & Associates, Inc., *Houston, TX* *Project Hydrogeologist*	1985 - 1987
McClelland Engineers, Inc., *Houston, TX* *Field Geologist*	1984

Registrations

Certified Geologist, *State of Maine, 1992, No. 310*

APPENDIX 5

ENVIRONMENTAL DATA RESOURCES, INC. REPORT

APPENDIX 6

TEST PIT EXCAVATION LOGS

APPENDIX 7

LABORATORY ANALYTICAL REPORTS

Denise Dyer

From: Denise Dyer
Sent: Tuesday, November 17, 2009 5:39 PM
To: Renee Lewis; 'Steve Etzel'
Subject: Keddy Mill Fire Incident

Importance: High

Just got a call from Dispatch Massey from Town of Windham. Keddy Mill had a small fire set in the inside around 5pm. Police and fire were dispatched and fire has been extinguished. Police are working on it right now. If you have any questions, you can call Chief Charlie Hammond- reference incident # 09-19580- call 892-1000. They asked that the building be boarded up.

I told them I would relay the message.

Denise Dyer
Administrative Coordinator

* Please Note New Address*

Hudson Realty Capital LLC
100 Commercial Street
Sutie 410
Portland, ME 04101
tel 207.772.7219
fax 207.772.7011
ddyer@hudsoncap.com
www.hudsonrealtycapital.com

Once every two weeks, Greater Portland Home Maintenance (GPHM) was going to check the Keddy Mill to secure or assess vandalizism. If noticed any, contact Bethany Roma or representative of HRC VLF who would then authorize all repairs.

An example of periodic checks is on December 15, 2006, GPHM found doorways pried open and sheathing on windows removed. Then notified HRC VLF about vandalizism, and GPHM got authorization to fix. The labor was $320.00 and materials were $110.66. On December 16th, all entry ways were secured.

During the week of January 8th-13th, GPHM received a phone call from Bethany Roma stating that Windham Police had contacted her stating that a large unauthorized operation of removing waste metal and other valuable material. GPHM went to the Keddy Mill on January 15th to resecure the building. Upon arrival, we noticed four large piles of waste shingles. GPHM also noticed the access way was cleared to make way for large equitpment. GPHM does not plow or remove any snow from the property. GPHM sifted through the waste files and found an electricity bill with the defendant's name on the bill. GPHM then contacted Bethany Roma. She confirmed it was the same gentleman who was summoned the week before. She asked how much waste and asked for an estimated cost to remove the waste.

That afternoon, GPHM notified Bethany with an estimate to resecure the property and the cost of removing the property. It was at this point, Bethany instructed us to not remove the waste because Bethany was notifying the Police Department about the waste. A Police Officer notified the defendant who was told he could either be summoned for illegal waste dumping or arrange for the waste to be removed at his cost. The defendant then made arrangements with Bethany Roma to remove the waste. Bethany then asked GPHM to provide a person to supervise the removal of the waste for safety purposes at the cost of the defendant. The defendant was to go to Keddy Mill on January 15th to remove the waste and didn't show. He did remove the waste the following week.

GPHM has been paid in full for all work.

_____

Jayson Candow
Owner
Greater Portland Home Maintenance

MEMO

Division of Remediation
Bureau of Remediation and Waste Management
Department of Environmental Protection
State of Maine

TO: Tom Bartell, Windham Economic Development Director

CC: John Cressey, Summit Environmental
Todd Coffin, GEI
Renee Lewis, Village at Little Falls

FROM: Jean Firth, Brownfields Coordinator
Troy Smith, Geologist

Date: October 25, 2011

Subject: Keddy Mill, Windham - Waste Volume Estimate

****

Based upon the information provided to the Maine Department of Environmental Protection (MEDEP) by Summit Environmental Consultants, Inc. (Summit) from the investigations completed at the Keddy Mill Site, we have developed a volume and cost estimate for the transportation and disposal of the building and the soils that are potentially impacted with Polychlorinated Biphenyls (PCBs). This is only a volume estimate based on the limited data available at this time. Significant assumptions on the percentage of soil and building materials above and below the TSCA hazardous waste level have been made in preparation of the cost estimate. Given the unit cost difference any change in the assumed percentage could significantly change the project costs. It should be noted that the actual volume of materials and the percentage of the volume in each category may differ significantly from the numbers used in this cost estimate.

Volume Estimate

At this point in time, the data necessary to accurately determine the volume of material has not been collected. However, based on the analytical data collected showing a correlation between metal waste and PCB contamination we have compiled this estimate. During the electrical conductivity testing completed by Summit in August 2011, estimated thicknesses of metal filings and/or slag material were developed based upon the anomalies seen in the EC log. Using the 100' x 100' grids and the thickness observed in the EC log as and indication of the presence of metal wastes which are assumed to be impacted with PCBs. The estimated impacted volume is approximately 35,000 cubic yards of impacted soils on the property. Using 1.5 tons per cubic yard for conversion purposes, this equates to 52,500 tons of soil.

A demolition contractor had completed a volume estimate in 2009 for Resurgence Engineering (Resurgence) and stated that there is approximately 2,000 cubic yards of concrete within the building. Using 2 tons per cubic yard for conversion purposes, the estimate is 4,000 tons of concrete.

TSCA Hazardous Waste Estimate

Our estimate of TSCA hazardous waste volumes assumes that 10% of the soil is impacted above the Toxic Substance Control Act (TSCA) hazardous waste criteria, and 90% of the soil is below that level. For the building we have estimated that 25% of the building materials are above the TSCA hazardous waste level and 75% are below it. These percentages are a conservative assumption based on the sample results from the site to date.

Cost Estimate

The table below summarizes estimated costs for transportation and disposal based on the above stated assumptions.

Material	Volume Estimate	Cost/Ton (T&D)	Total Estimated Cost
Soil Above TSCA Hazardous Level	5,250	$600	$3,150,000
Soil Below TSCA Hazardous Level	47,250	$85	$4,016,250
Concrete Above TSCA Hazardous Level	1,000	$600	$600,000
Concrete Below TSCA Hazardous Level	3,000	$85	$255,000
		Total	$8,021,250

This estimate does not include additional sampling cost to delineate the extent of contamination, demolition of the building, excavation contractor, equipment, backfill, shoring or stabilization of the dam, or any contingencies for construction activities.

Steve Etzel

From: tisa.kimberly@epamail.epa.gov
Sent: Wednesday, December 10, 2008 8:51 AM
To: Steve Etzel
Cc: milette.marianne@epamail.epa.gov
Subject: Former Keddy Mill, E. Wyndham, ME

Follow Up Flag: Follow up
Due By: Thursday, December 11, 2008 6:00 AM
Flag Status: Flagged

Steve-

As discussed this morning, EPA had authorized a cleanup to address PCB contamination at the Site in June 2006. You indicated that to-date none of the remedial work has been done. Given this, please provide the following information:

A discussion of why the PCB cleanup has not been completed as originally approved.

A discussion on the current status of the site. Please include a discussion about the PCB contaminated areas and if there is any potential for migration of PCBs from the site and potentially increasing the contamination. Is there any potential exposure to people that may assess the site? If there is security, please include in discussion.

A schedule for completing the work.

Thank you for your attention to this matter.

Kimberly N. Tisa (CPT)
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100
Boston, MA 02114

617.918.1527 (phone)
617.918.0527 (fax)

GEI

VIL_RESP00998

Maine Department of Environmental Protection

Maine Voluntary Response Action Program

Application for Assistance

Please complete this application to request technical assistance from the Voluntary Remedial Action Plan Program (VRAP) pursuant to Title 38 MRSA, Section 342, Subsection 15.

General Site Information

Property name: Former Depot Energy Company

Street Address: 13 Depot Street

City (or Township): Windham

Tax map #: 38 Lot #: 6

Latitude: 43° 44' 08" N Longitude: 70° 25' 25" W

Total Acreage of Property (all parcels): 1 acre

Property Description Recorded at Registry of Deeds

County: Cumberland Book: 1681 Page: 99

Applicant Information

Applicant/Organization*: Little Falls Village, LLC

Contact Person: Renee Lewis Title: Primary Contact

Address: c/o Quisitor & 50 Monument Square

City: Portland State: ME Zip: 04101

Phone: 772-7219 Fax: 772-7011

*The applicant is the individual or organization that will be the recipient of any applicable administrative or liability assurances provided by VRAP. The applicant is also responsible for payment of fees for Department review and oversight costs.

Current property owner (if different than applicant)

Name: Joseph Kittrell Title: _____

Organization: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Applicant's interest in the property

____ Current Owner ____ Mortgagee Interest

____ Rent or lease ____ Other: _____

____ Potential Buyer

Involvement with other regulatory programs

____ Yes

____ None known

If yes, list the program/contact person from the Department: _____

_____

Contact person(s)

Please list the name(s) of your current environmental consultant and legal counsel.

Consultant: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Attorney: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Certification

I hereby make a request of VRAP to assist me and the company/organization I represent in determining whether the above-described property has been the site of a release or threatened release of a hazardous substance, hazardous waste, hazardous matter, special waste, pollutant or contaminant, including petroleum products or by-products. I understand this assistance may include the review of agency records and files, and review and approval of my investigation plans and reports as well as remedial action plans and implementation.

I am aware that VRAP, at its discretion, may contact municipal officials regarding investigation/remedial actions at sites participating in the program.

I am aware that I must reimburse VRAP for the costs of providing this assistance. I understand that reimbursement requests may be made on a periodic basis and that failure to reimburse VRAP for costs in a timely manner may result in disqualification from VRAP.

Typed/printed name:_____ Title:_____

Signature:_____ Date:_____

Revised 12/23/2002

Maine Department of Environmental Protection

Maine Voluntary Response Action Program

Application for Assistance

Please complete this application to request technical assistance from the Voluntary Remedial Action Plan Program (VRAP) pursuant to Title 38 MRSA, Section 342, Subsection 15.

General Site Information

Property name: Former Keddy Mill

Street Address: 7 Depot Street

City (or Township): Windham

Tax map #: 38 Lot #: 7

Latitude: 43° 44' 05" N Longitude: 70° 25' 29" W

Total Acreage of Property (all parcels): 8 acres

Property Description Recorded at Registry of Deeds

County: Cumberland Book: 18046 Page: 32

Applicant Information

Applicant/Organization*: Little Falls Village, LLC

Contact Person: Renee Lewis Title: Primary Contact

Address: c/o Questor @ 50 Monument Square

City: Portland State: ME Zip: 04101

Phone: 772-7219 Fax: 772-7011

*The applicant is the individual or organization that will be the recipient of any applicable administrative or liability assurances provided by VRAP. The applicant is also responsible for payment of fees for Department review and oversight costs.

VIL_RESP01002

HRC004031

Current property owner (if different than applicant)

Name: Scott Lalumiere Title: _____

Organization: Lumis, Inc.

Address: 25 Pearl Street

City: Portland State: ME Zip: 04101

Phone: 829-5651 Fax: _____

Applicant's interest in the property

___ Current Owner ___ Mortgagee Interest

___ Rent or lease X Other: Development partner

___ Potential Buyer

Involvement with other regulatory programs

___ Yes

X None known

If yes, list the program/contact person from the Department: _____

_____

Contact person(s)

Please list the name(s) of your current environmental consultant and legal counsel.

Consultant: Jacques Whitford of Foley Cotton

Address: 75 Pearl Street, Suite 410

City: Portland State: ME Zip: 04101

Phone: 761-7770 Fax: 761-7631

Attorney: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Certification

I hereby make a request of VRAP to assist me and the company/organization I represent in determining whether the above-described property has been the site of a release or threatened release of a hazardous substance, hazardous waste, hazardous matter, special waste, pollutant or contaminant, including petroleum products or by-products. I understand this assistance may include the review of agency records and files, and review and approval of my investigation plans and reports as well as remedial action plans and implementation.

I am aware that VRAP, at its discretion, may contact municipal officials regarding investigation/remedial actions at sites participating in the program.

I am aware that I must reimburse VRAP for the costs of providing this assistance. I understand that reimbursement requests may be made on a periodic basis and that failure to reimburse VRAP for costs in a timely manner may result in disqualification from VRAP.

Typed/printed name:_____ Title:_____

Signature:_____ Date:_____

Revised 12/23/2002

[redacted]

To: Voluntary Response Action Program (VRAP) Users

From: Nicholas Hodgkins, VRAP & Brownfields Coordinator

Date: December 23, 2002

Re: Changes to the VRAP Application

Attached is a copy of the new Voluntary Response Action Program (VRAP) Application. The application has been revised to reflect the need to collect some additional information, as well as the need to eliminate some of the information that we had previously requested.

The new Brownfields legislation, passed into law in January 2002, requires the state to keep a list of sites that the VRAP has completed or is currently working on. There is also a requirement to list those sites where institutional controls are part of the remedy. We currently have such a list, but it is need of updating. The new information that we hope to collect with the revised application is related to location, size, and the corresponding legal description of the property.

Beginning immediately, this application is to be used for all VRAP sites. Each property will need to be located by street address, tax map and lot number, latitude and longitude and by the recorded book and page for the property description. In addition, the total acreage will need to be included. If the property participating in VRAP consists of more than one parcel, the appropriate information must be included for each parcel (attach a separate sheet of paper, if necessary).

Should you have questions when completing this application, please call me at (207) 287-4854. Our fax number is (207) 287-7826.

When completed, mail the original copy of the application along with the applicable environmental report(s) and fees to:

Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
Division of Remediation
17 State House Station
Augusta, Maine 04333-0017
Attention: Nicholas J. Hodgkins, VRAP

Note: The initial application fee is still $500. Checks for fees should be made payable to the Treasurer, State of Maine for deposit into the Maine Uncontrolled Sites Fund. If the Department incurs additional staff time in review and oversight of VRAP activities that are not covered by the initial fee, an hourly charge for actual direct and indirect costs will be assessed. Initial fee payments are non-refundable.

Maine Department of Environmental Protection

Maine Voluntary Response Action Program

Application for Assistance

Please complete this application to request technical assistance from the Voluntary Remedial Action Plan Program (VRAP) pursuant to Title 38 MRSA, Section 342, Subsection 15.

General Site Information

Property name: _____

Street Address: _____

City (or Township): _____

Tax map #: _____ Lot #: _____

Latitude: _____ Longitude: _____

Total Acreage of Property (all parcels): _____

Property Description Recorded at Registry of Deeds

County: _____ Book: _____ Page: _____

Applicant Information

Applicant/Organization*: _____

Contact Person: _____ Title: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

*The applicant is the individual or organization that will be the recipient of any applicable administrative or liability assurances provided by VRAP. The applicant is also responsible for payment of fees for Department review and oversight costs.

Current property owner (if different than applicant)

Name: _____ Title: _____

Organization: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Applicant's interest in the property

____ Current Owner ____ Mortgagee Interest

____ Rent or lease ____ Other: _____

____ Potential Buyer

Involvement with other regulatory programs

____ Yes

____ None known

If yes, list the program/contact person from the Department: _____

_____

Contact person(s)

Please list the name(s) of your current environmental consultant and legal counsel.

Consultant: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Attorney: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Certification

I hereby make a request of VRAP to assist me and the company/organization I represent in determining whether the above-described property has been the site of a release or threatened release of a hazardous substance, hazardous waste, hazardous matter, special waste, pollutant or contaminant, including petroleum products or by-products. I understand this assistance may include the review of agency records and files, and review and approval of my investigation plans and reports as well as remedial action plans and implementation.

I am aware that VRAP, at its discretion, may contact municipal officials regarding investigation/remedial actions at sites participating in the program.

I am aware that I must reimburse VRAP for the costs of providing this assistance. I understand that reimbursement requests may be made on a periodic basis and that failure to reimburse VRAP for costs in a timely manner may result in disqualification from VRAP.

Typed/printed name:_____ Title:_____

Signature:_____ Date:_____

Revised 12/23/2002

VOLUNTARY RESPONSE ACTION PLAN
FOR
VILLAGE AT LITTLE FALLS, LLC
SOUTH WINDHAM, MAINE

Prepared for:

Renee Lewis
2 Market Street, 6th Floor
Portland, Maine 04101

Prepared by:

Ransom Environmental Consultants, Inc.
200 High Street
Portland, Maine 04101
(207) 772-2891

Project No. 046016
June 8, 2005

D. Todd Coffin
Maine Certified Geologist No. 310

TABLE OF CONTENTS

1.0 INTRODUCTION

Ransom Environmental Consultants, Inc. (Ransom) has prepared the enclosed Voluntary Response Action Plan (VRAP) for review by the Maine Department of Environmental Protection (MDEP). The owner of the property, Village at Little Falls, LLC (VLF), seeks a "No-Action Assurance" letter from MDEP. Ransom understands that once clean-up measures proposed herein have been completed, MDEP will review clean-up documentation and issue a "Certificate of Completion" provided it concurs that the VRAP has been fully implemented.

The VLF property is comprised of two contiguous parcels of land located at 7 and 13 Depot Street in South Windham, Maine (Figure 1). 7 Depot Street is the former location of the Keddy Steel Mill. 13 Depot Street is the former location of the Energy Depot Company. Site development plans include demolition and removal of the former mill building and construction of residential units across the site.

In late 2004, VLF submitted to MDEP a VRAP application, application fees, and previous site investigation reports. The prior reports included:

1. Environmental Site Assessment, Phase I & II, Former Steel Mill Property, Route 202 and Depot Street ,Windham, Maine, by S.W. Cole Engineering, Inc., November 17, 1997.

2. Phase I Limited Environmental Assessment, Lot 7 of Map 38, Windham Township, South Windham, Cumberland County, Maine, by Consla Geotechnical Engineering, March 18, 1993.

3. Report on Supplemental Site Investigation, 7 Depot Street, Windham, Maine by Jacques Whitford Company, Inc., March 9, 2004.

4. Phase I and II, Environmental Site Assessments, Former Depot Energy Company 13 Depot Street, Windham, Maine, by Jacques Whitford Company, Inc., June 14, 2004.

Following review of these reports by MDEP, VLF, Ransom and Nick Hodgkins with MDEP met on August 27, 2004 to discuss clean-up requirements for the site. Key findings from this meeting are detailed below.

7 Depot Street

- MDEP has classified the entire site (7 and 13 Depot Street) as a "stringent" site; however, given specific onsite conditions and contaminant characteristics, clean-up will not be performed to the prescriptive criteria of a stringent clean-up, but will be modified to less-stringent criteria that is appropriate for the site.

- MDEP has requested that oily soils excavated during site development activities be transported off-site for proper disposal or reclamation (*e.g.*, asphalt batching). The "Baseline 2" standard would apply to heavy oils, such as motor oil or heating oils heavier than No. 2. Although not identified at the 7 Depot Street site, any spill of light oils, such as gasoline, would fall under MDEP "Intermediate" clean-up guideline.

- The investigation and remediation of PCBs at the site will require review by MDEP and the US Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA).

- The PCB mitigation will target source areas in site soils. Removal and/or stabilization of PCBs in source areas will be protective of human health and substantially reduce the potential for impacts to the nearby river. VLF will not be responsible for any testing or clean up associated with potential historic impacts to the river. Such impacts, if present, will be addressed by MDEP in the context of its ongoing regional and state water quality assessment programs.

13 Depot Street

- Gasoline-impacted soils will require remediation to the MDEP "Intermediate" guideline (5 mg/kg – lab result). Mr. Hodgkins noted that a reading of 50 ppm using a photoionization detector is often a reasonable target for identifying, in the field, soils that meet (or are close to meeting) the 5 mg/kg criteria. PID readings will guide proposed soil removal activities.

- Soils visibly impacted by motor oil or other petroleum products (such as surface stains under or near auto transmissions and other equipment) would require removal and off-site disposal or reclamation.

2.0 SITE BACKGROUND

2.1 7 Depot Street

2.1.1 Site Description

The site consists of a former steel mill located on 7 Depot Road in South Windham, Maine (refer to Figure 1). The approximately 6.5 acre parcel is bordered by Depot Street to the North, Maine Central Railroad tracks to the east, the Presumpscot River to the South and Route 202 to the West. The site was reportedly first developed for industrial use in the 1700s, and over the years uses included a saw mill, grist mill, manufactured wood board mill and the steel mill whose remnants presently occupy the site.

The site is presently occupied by a former mill building constructed primarily of concrete and brick. The majority of the building consists of two levels, including a basement that is partially below grade. According to S.W. Cole, the building included a boiler house,

forge shop, press building, melt building and offices. The forge shop and boiler house have been razed.

Public water and sewer are available to the site area. Portland Water District records for South Windham indicate that a number of residences generally east of the site have water supply wells. The closest wells to the site include the Boulanger, Georgatos and Reed residences, located about 500 to 1,000 feet to the northeast. Site topography indicates these residences are located at an elevation 20 to 40 feet higher than the site

2.1.2 Prior Subsurface Investigations

S.W. Cole

Subsurface investigations by S. W. Cole in 1995 and 1996 included completion of twenty-four test pits targeting former storage tanks and other areas of potential concern. Soil samples were screened for volatile organic compounds with a photoionization detector (PID) and six soil samples were tested in a laboratory either for fuel oil, pesticides, PCBs, or heavy metals.

S. W. Cole identified heavy oil-impacted soil at the northern end of the site near Depot Street. The impacted soil was located in the vicinity of a two former above-ground heavy oil storage tanks (now removed). S. W. Cole removed approximately 11 tons of soil impacted by the heavy oil. The MDEP assigned a "Baseline-2" clean-up goal for the site. This goal includes removal of soils with fuel oil concentrations of 200 to 400 parts per million (ppm) based on field screening instrumentation. The Baseline-2 goal is generally applicable to sites in downtown urban areas or commercial strips where groundwater is not likely to be used in the future.

S. W. Cole's 1997 report indicated that the MDEP Baseline 2 goal was met following impacted soils removal. S. W. Cole further reported that "field headspace testing of soil samples from test pits adjacent to known and reported locations of the eleven storage tanks indicated non-detectable levels of ionizable organic compounds." S. W. Cole reported that six of the eleven fuel storage tanks remained at the site at the time of their investigation. The six tanks, formerly located in the boiler house, have since been removed and no subsurface impacts were reported.

Laboratory testing of soils by S. W. Cole detected no volatile organic compounds, and copper was the only heavy metal detected at concentrations higher than naturally-occurring soils. Laboratory testing of oil-impacted soil removed from the site identified no semi-volatile organic compounds using the toxicity characteristic leaching procedure (TCLP).

Jacques Whitford

In August, 2003, Jacques Whitford completed supplemental investigations including twelve test pits, six hand augers and twenty-three surface soil samples at the 7 Depot

Street site to evaluate areas of potential concern identified during previous site investigations. These areas included:

- Two former above ground fuel storage tanks (15,000 and 10,000 gallon capacity) near the railroad tracks on the east side of the site where oil-stained soils were observed during a previous site investigation;
- Two 1,000 gallon underground wastewater tanks adjacent to the north wall of the facility;
- Former 3,000 gallon above-ground fuel tank located at the end of a rail spur on the east side of the site;
- Transformer pad/electrical substation on the south side of the site;
- Former drum storage area at the south end of the former mill building;
- Former garage at the south end of the site; and
- Two floor drains on the ground floor of the main mill building.

Test Pits

On August 4, 2003, twelve test pits (TP-101 to TP-112) were advanced to evaluate areas of potential concern (refer to Jacques Whitford Figure 2, Appendix A). The rationale for each is listed below.

Sample ID	Location/Rationale
TP101	Adjacent to former wastewater holding tanks
TP102	In area of stressed/sparse vegetation during site walk on June 27, 2003
TP103	In area of stressed/sparse vegetation during site walk on June 27, 2003
TP104	Former No. 6 oil spill clean up area
TP105	Former No. 6 oil spill clean-up area
TP106	Former 250K gallon above ground fuel oil tank
TP107	Downslope from former Depot Energy Company
TP108	Downslope from former Depot Energy Company
TP109	Adjacent to former 15K gallon above ground fuel oil tank
TP110	Adjacent to former 10K gallon above ground fuel oil tank
TP111	Former outside drum storage area
TP112	River side of former garage

Jacques Whitford observed the test pitting, screened the soil with a PID, collected soil samples for laboratory analysis, and recorded observations pertaining to the physical characteristics of the soil on test pit logs.

Hand Augers

On August 5, 2003, Jacques Whitford advanced borings at six locations with a hand auger (HA-1 to HA-6 on Figure 2, Appendix A). These borings were advanced to auger refusal on cobbles which varied from 0.5 to 1.5 feet below ground surface.

Sample ID	Location/Rationale
HA-1	Adjacent to outside transformer pad
HA-2	Adjacent to outside transformer pad
HA-3	Along exterior building wall, adjacent to interior floor drain in building basement
HA-4	Apparent oil-stained surface soils (2 ft x 5 ft)
HA-5	From floor drain on basement level of building
HA-6	In area of apparent oil-stained surface soils (3 ft x 6 ft)

Surface Soil Samples

Based on test data collected for the site during the test pit and hand auger programs, Jacques Whitford collected surface soil samples from inside and outside the former mill building for polychlorinated biphenyls (PCB) testing. One sample (SS105) was tested for metals. The sample locations are labeled SS1-SS15 and SS101-SS108 on Figure 2.

Sample ID	Location/Rationale
SS1	South of floor "cut out" along north building wall; PCBs identified in drain
SS2	North of floor "cut out" along north building wall
SS3	East of floor "cut out" along north building wall
SS5	Floor "cut out" along north building wall
SS6	Floor drain along south building wall
SS7	Soil from concrete floor south of maintenance shop
SS8/SS9	Soil from concrete floor in maintenance shop
SS10	Soil from concrete floor near former transformer
SS11	East of stained soil outside building; PCBs identified in stained soils
SS12	South of stained soil outside building
SS13	West of stained soil outside building
SS14	Stained soils outside building (0-0.5 ft)
SS15	Stained soils outside building (0.5-1 ft)
SS101	Floor drain along south building wall
SS102	Soil on concrete floor on basement level
SS103	Soil on concrete floor on basement level
SS104	Soil on concrete floor on basement level
SS105	Soil from outside south wall, adjacent to interior drain (metals testing)
SS106	Soil from outside south wall, adjacent to interior drain (PCB testing)
SS107	Soil from outside south wall, down slope from interior drain
SS108	Soil from outside south wall, down slope from interior drain

Jacques Whitford collected samples HA-5 and SS-5 from the center of an approximately 1-ft x 1ft square cut out in the concrete floor of the former mill building. Jacques Whitford collected samples SS1, SS2, and SS3 by coring through the concrete floor in the vicinity of the "cut out." SS4, proposed for the west side of the "cut out," could not be completed due to an obstruction.

Jacques Whitford collected samples SS6 and SS101 from a floor drain along the south wall of the building. The drain was about 1.5 ft x 1.5 ft square and contained water at a depth of about 2 ft below the floor level. Soil samples SS106, SS107 and SS108 were collected outside the building, adjacent to the floor drain. Hand excavation along the building wall did not identify a discharge pipe from the drain. Jacques Whitford indicated that the drain may have an open bottom or sides under the building floor, with no point discharge.

Surface samples SS7, SS8/ SS9 (duplicate of SS8), SS10, SS102, SS103, and SS104 were composed of soil-like material that had accumulated on the building's concrete floor. SS7, SS8/SS9 and SS10 were collected from the second floor of the building; the others were collected from the basement/ground level. Sample locations were selected based on proximity to oil stains, maintenance activities and former electrical equipment, such as transformers. Oil stained concrete and wood was also observed inside the building; these materials have not been sampled to date.

Chemical Testing

Selected soil samples were tested for VOCs (EPA Method 8260-B), diesel-range organics (DRO), the eight RCRA metals, and PCBs. Samples were selected based on field PID readings, visual indications possible impact, and position at or near the water table. Sample numbers, dates, depths and analytical results are summarized on the data table prepared by Jacques Whitford in Appendix A.

Jacques Whitford tested soils from TP-101, TP-104, TP-107, TP-111 and HA-6 for DRO and VOCs. DRO concentrations ranged from approximately 9 mg/kg (TP-104) to 9,100 mg/kg (HA-6). DRO fingerprinting indicated the presence of heavy oil, such as motor oil, in the samples tested. Lighter oils, such as gasoline, diesel or #2 fuel oil, were not identified. This finding is consistent with the results of VOC testing where no constituents of lighter oils were identified, such as benzene, toluene, ethylbenzene, xylenes (BTEX) and methyl-tertiary butyl ether (MTBE). Methylene chloride and trichlorofluoromethane were detected in each of the samples and are suspected to be the result of cross contamination in the laboratory.

Soil samples from TP-102, TP-103, TP-107, TP-110, TP-112, SS-101 and SS105 were sampled for the eight RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). With the exception of arsenic, the metals concentrations were below the DEP Remedial Action Guidelines (RAG) for residential settings. Arsenic was detected slightly above the RAG of 10 mg/kg at TP-102 (16 mg/kg), TP-103 (11 mg/kg), TP-110 (16 mg/kg), TP-112 (22 mg/kg), SS101 (17.5 mg/kg) and SS105 (13.6 mg/kg).

PCB Results for Former Transformer Pad: Relatively low concentrations of PCBs were detected in surface soils adjacent to the former transformer pad. Total PCB concentrations ranged from 0.119 mg/kg (parts per million – ppm) at HA-1 to 0.056 ppm at HA-2 (Figure 2).

PCB Results for Stained Surface Soils along South Building Wall: Jacques Whitford detected 2.8 ppm total PCBs in surface soils sampled from apparent oil-stained soils along the south building wall (SS14). The PCBs detected included Aroclor 1016, 1242, 1254, and 1260.

Surface soil samples collected at SS11, 10 feet to the east of SS14, were non-detect for PCBs. Likewise, surface soils collected at SS12, 10 feet to the south of SS14, were non-detect for PCBs. Surface sample SS13, 10 feet west of SS14, contained total PCBs of 0.135 ppm. The testing indicates limited aerial extent of PCB impacts at SS14.

PCB concentrations appear to decrease with depth at this location given detection of 2.8 ppm total PCBs in surface sample SS14 (0-0.5 ft), 1.8 ppm in sample SS15 (0.5-1 ft), and 0.63 ppm detected in HA-4 (1-2 ft); each of these samples were co-located.

PCB Results for Floor "Cut Out" along North Wall of Basement: Jacques Whitford detected 77 ppm total PCBs in surface soils sampled from the cut out in the concrete floor of the building basement (SS5). PCBs detected included Aroclor 1254 and 1260.

Soils sampled beneath concrete flooring at SS1, 10 feet south of SS5 contained 0.09 ppm total PCBs. Soils beneath the concrete floor at SS2, 5 feet north of SS5, contained 0.817 ppm total PCBs. Soils beneath concrete at SS3, 10 feet east of SS5, contained non-detectable PCB concentrations.

Test data indicate decreasing PCB concentrations with depth at the concrete floor "cut out." The surface soil sample SS5 (0-0.5 ft) contained 77 ppm total PCBs, while HA-5 (0.5 to 1 ft depth) contained 36 ppm total PCBs.

PCB Results for Floor Drain and Exterior Soils along South Wall of Basement: Total PCBs at 173 ppm (Aroclor 1254) were detected in sediments collected from a floor drain located along the south wall of the building basement (SS6). Confirmatory sampling from the same drain indicated 262 ppm PCBs (SS101) and 570 ppm PCBs (SS101 duplicate).

Soils sampled from a depth of 1.5 feet outside the building and adjacent to the interior floor drain (SS106) contained 113 ppm PCBs (Aroclor 1254). SS107, located about 10 feet west of SS106 (toward the river), contained 120 ppm Aroclor 1254; the sample depth was about 1 1/2 feet. SS108, located about 11 feet west of SS107, contained 9.3 ppm Aroclor 1254; the sample depth was about 1 foot.

PCB Results for Soil Build-up on Interior Concrete Floors: Material sampled from the surface of the concrete floor inside the building contained total PCBs ranging from 11 ppm (SS8) to 138 ppm (SS103). The PCBs detected included Aroclor 1254 and 1260.

Ransom Environmental

Ransom tested three background samples for arsenic on November 8, 2004. Surface soil samples were collected from the Windham Historical Society grounds, the US Postal Service Training Center and the South Windham Fire Department property. The concentrations of arsenic detected were 28.3, 5.1 and 24.1 mg/kg, respectively. These concentrations are similar to those detected at the 7 Depot Street site, and indicate the arsenic is naturally occurring.

2.2 13 Depot Street

2.2.1 Site Description

The 13 Depot Streets site is located on the southern side of Depot Street adjacent to Maine Central Railroad tracks, approximately 300 feet west of High Street. The site is designated by the Windham Assessor's Office as Map 38, Lot 6 and is approximately 40,850 square feet. The site is improved with a one-and-a-half story, wood frame garage, a one-and-a-half story wood frame former railroad station, a one-story wood-frame apartment and storage building, two steel railroad box cars with wood floors, one 10,000-gallon railroad tank car, and an in-ground scale. The site is served by public sewer and water. A site plan is shown on Figure 3.

The garage is constructed on a concrete slab and contains one floor drain and an above ground 275-gallon furnace oil tank. The former railroad station sits on a concrete slab with no basement and is used as storage for automobile transmissions and other automobile parts. The apartment and storage building contains an above ground 275-gallon furnace oil tank and numerous automotive parts and supplies. The two steel-walled, wooden-floor, railroad boxcars are used for storage for automotive engines, transmissions, and other miscellaneous materials.

The 10,000-gallon tank car was installed in 1983 between the former depot station and the southern railroad boxcar on the western edge of the site. It is constructed on a steel frame with a concrete foundation and it is used to store #2 fuel oil. The tank is surrounded on all sides by an earthen berm. The 240 square-foot concrete scale is located adjacent to the warehouse on the western side and apparently is drained via a discharge pipe that discharges into the drainage ditch at the southeastern border of the Subject Site.

A drainage ditch is located adjacent to the southern and western boundaries of the property. A PVC pipe discharges to the drainage ditch and is reportedly connected to the subsurface area near the in-ground scale west of the warehouse.

2.2.2 *Prior Subsurface Investigations*

Acadia Environmental

Acadia Environmental Technology (Acadia) of Portland, Maine prepared an underground storage tank (UST) Site Assessment Report in November 1993 for Merrill and Camilla Laskey, the former owners of the 13 Depot Street site. The report addressed a 500-gallon UST removed from the site on October 28, 1993.

The tank was installed in 1988 and was located as indicated on Figure 2. Upon removal, the UST showed light pitting on one end. The condition of the underground piping was reported to be excellent. A gasoline pump was enclosed directly above the tank in a small shed. Acadia reported a PID jar headspace result of 591 ppm in "black, wet, coal, organic, clay" approximately 3 feet below ground surface from the north end of the tank grave. All other PID readings were less than 100. A laboratory sample yielded 77 mg/kg by MDEP Method 4.2.3 for gasoline. During the tank removal, Acadia contacted Jon Woodard of the MDEP and was instructed to collect the laboratory sample, backfill the excavation and report the results. MDEP required no further action.

Jacques Whitford

Based on the findings of a Phase I environmental assessment of the 13 Depot Street Site, Jacques Whitford conducted Phase II fieldwork at the site between May 7 and 12, 2004. The fieldwork included excavation of test pits and soil sampling for PID screening and laboratory analysis.

Test Pits and Soil Sampling

On May 7, 2004, Jacques Whitford excavated ten test pits at the locations depicted on Figure 3. Test pits were terminated at bedrock refusal between 1.8 and 10 feet below ground surface (bgs). At each test pit location, Jacques Whitford, collected bag headspace samples at 2-foot intervals. Each soil sample was screened in the field for VOC content using a PID. Jacques Whitford also collected bag headspace samples at five surface sampling locations (HS-1 to HS-5) for PID testing.

Based on PID readings and location, Jacques Whitford chose three of the sample intervals for chemical testing for GRO and/VOCs. Jacques Whitford submitted the sample from TP-4 (2-4 feet below ground surface), for testing of GRO and VOCs; this sample had the highest PID reading at the site (>1000 ppm). Jacques Whitford also conducted VOC testing on soils with the highest PID reading from TP-2, located adjacent to a boxcar, and from TP-3, located in an apparent oil stained area in the gravel parking lot.

Jacques Whitford collected samples SS-1, SS-2, and SS-3 for PCB testing. These three samples were from areas of surface soil staining near stored transmission parts (SS-1), an aboveground hydraulic lift (SS-2), and from sediment in the floor drain in the garage (SS-3).

Two surface soil samples (SS-4 and SS-5) were collected for testing of the eight RCRA metals. These soils were sampled from areas of visible surface oil staining.

PID Screening and Chemical Test Results

PID readings varied from 7 to over 1,000 ppm. The only readings over 100 ppm were in TP-2, TP-3, and TP-4. Readings >1000 ppm were observed from 2-6 feet below ground surface in TP-4. The PID readings in TP-4 decreased with depth below the 4-6 feet depth interval. TP-4 is located in a downhill direction from the removed gasoline UST at the site.

Laboratory test results for soils sampled at the 13 Depot Street site are summarized below. The results indicate gasoline-impacted soils in test pit TP-4, located downslope from a former underground gasoline tank. The only other VOC detected in the soils was acetone, a likely laboratory contaminant. PCBs were not detected in the surface soil samples (SS-1, SS-2 and SS-3).

Analyte	Units	TP-3, 2-4	TP-4, 2-4	SS-4	SS-5
Acetone	ug/kg	197	<23,400	NA	NA
n-Butylbenzene	ug/kg	<7.1	2,570	NA	NA
Ethylbenzene	ug/kg	<7.1	5,440	NA	NA
4-Isopropyltoluene	ug/kg	<7.1	2,100	NA	NA
Naphthalene	ug/kg	<7.1	16,700	NA	NA
n-Propylbenzene	ug/kg	<7.1	3,340	NA	NA
Toluene	ug/kg	<7.1	4,320	NA	NA
1,2,4-Trimethylbenzene	ug/kg	<7.1	50,900	NA	NA
1,3,5-Trimethylbenzene	ug/kg	<7.1	24,400	NA	NA
m,p-Xylene	ug/kg	<14.2	26,400	NA	NA
o-Xylene	ug/kg	<7.1	2,990	NA	NA
Gasoline Range Organics	mg/kg	NA	837	NA	NA
Arsenic	mg/kg	NA	NA	12.8	15.6
Barium	mg/kg	NA	NA	47.4	24.1
Chromium	mg/kg	NA	NA	15.4	17.6
Lead	mg/kg	NA	NA	34.5	49.5

NA denotes not analyzed

With the exception of arsenic, the metals concentrations were below the MDEP Remedial Action Guidelines (RAG) for residential settings. Arsenic was detected slightly above the

RAG of 10 mg/kg in soil samples SS-4 and SS-5. Based on background soils sampling by Ransom, the arsenic appears to be naturally occurring.

3.0 RESPONSE ACTION PLAN

3.1 7 Depot Street

3.1.1 Petroleum-Impacted Soils

Given the industrial history of the site and availability of public water supply to the site area, MDEP has requested implementation of Baseline-2 soil clean-up guidelines for any impacts from heavy oil products (*e.g.*, bunker oil, motor oil). For soils impacted by light petroleum products, such as gasoline, MDEP has requested implementation of intermediate clean-up guidelines for soils. The clean-up requirements for each are:

> Baseline-2: removal free product and remove or remediate contaminated soil to: 500 to 1,000 ppm gasoline range organics and 200 to 400 ppm diesel range organics, each as measured by field headspace analysis.
>
> Intermediate: remove or remediate contaminated soil containing greater than 10 mg/kg diesel range organics, or 5 mg/kg gasoline range organics as determined by a DEP-approved laboratory method.

Prior work at the 7 Depot Street site by S.W. Cole involved investigation and clean-up of soils impacted by No. 6 fuel oil. Soils testing following excavation of impacted soils confirmed that the Baseline-2 standard was met.

Investigations by Jacques Whitford and subsequent review of all prior site investigation reports by Ransom indicated the Baseline-2 standard has been met for the areas sampled, including oil-stained surface soils. The maximum PID reading identified by Jacques Whitford during their investigations in 2004 was 8.5 ppm. Chemical testing of stained soils indicated that the oil was a heavy-end product, such as motor oil.

Soils impacted by light petroleum products, such as gasoline, have not been identified at the 7 Depot Street site. Excavation contractors working at the site will be instructed to contact Ransom should soils with petroleum odors or other evidence of contamination be encountered. In such cases, Ransom will conduct a site visit and perform sampling of impacted media to determine the appropriate course of action. MDEP will be notified if unanticipated subsurface contamination is encountered.

3.1.2 PCB-Impacted Soils

Soils from the floor drain and the concrete cut-out in the building basement, and areas sampled outside the mill building contained PCBs at concentrations ranging from <32 to 570 ppm. The PCBs were likely released from maintenance and handling of former transformers and other electrical equipment used at the site. Given the age of the mill

building, it is possible the transformers and electrical equipment were in use prior to 1978. Since the concentrations of PCBs identified in site soils are ≥50 ppm, the impacted materials are defined by EPA under 40 CFR 761.61 as "PCB Remediation Wastes."

Site development includes the demolition and removal of the former mill building, followed by construction of residential units (refer to Figure 4). Based on EPA criteria under 40 CFR 761.61, the areas of subsurface soil impact (labeled "Area A" and "Area B" on Figures 2, 4 and 5) are categorized as follows.

Area A: Area of PCB-impacted soils located beneath or on the periphery of a proposed paved site access drive. This area meets EPA criteria for a "Low Occupancy Area" in that it constitutes an "unoccupied area outside a building" and is a location where "occupancy is transitory" (40 CFR 761.61). More specifically, a Low Occupancy Area is an area where occupancy for individuals not wearing dermal and respiratory protection is less than 335 hours per calendar year (an average of 6.7 hours per week).

In accordance with 40 CFR 761.61, the clean-up level for PCB-impacted soils in Low Occupancy Areas is ≤25 ppm, or ≤100 ppm if a soil cap is installed.

Area B: Area of PCB-impacted soils located beneath landscaping and lawn of residential units. This area potentially meets EPA criteria for a "High Occupancy Area" in that it constitutes an area where occupancy for individuals not wearing dermal and respiratory protection is 335 hours or more (an overage of more than 6.7 hours per week).

Clean-up levels for PCB-impacted soils in High Occupancy Areas is ≤1 ppm or ≤10 ppm with a soil cap.

Additional Testing

Ransom will conduct additional testing to delineate PCB-impacted soils following demolition and removal of the former mill building. In accordance with the EPA self-implementing pre-cleanup sampling approach as provided in §761.61 Subpart N, sampling will utilize a 3-meter grid centered around the floor drain on the basement level of the former mill building. Proposed sample locations are labeled B1 through B12 on Figure 5.

Soils will be sampled continuously over 2-foot intervals using direct-push drilling; each hole will be advanced to a depth of 6 to 8 feet. Soils will be composited from each 2-foot sample interval, yielding three to four samples from each boring for laboratory testing of PCBs. Soils will be tested for PCBs in the laboratory in accordance with EPA Method SW-846.

NRPA Permitting

Given anticipated soil excavation within 75 feet of the Presumpscot River, the project will fall under the Natural Resources Protection Act (NRPA). The project team will

request a site visit by MDEP's Land and Water Quality Bureau to identify specific requirements under NRPA and the Army Corps of Engineers. The Windham Code Enforcement Office will also be contacted relative to possible requirements under Municipal Shoreland Zoning rules.

Soil Removal and Disposal

Prior to soil removal, notice will be provided to the EPA Regional Administrator (at least 30 days prior to clean-up) and a PCB clean-up plan will be prepared for review and approval by EPA as required under 40 CFR 761.61. The plan will include, as required, schedule, disposal technology and approach.

Area A: Following demolition and removal of the former mill building, PCB-impacted soils ≥25 ppm will be targeted for removal in Area A by a hazardous waste contractor based on the findings of the additional soil testing. Following soil removal and backfilling to proposed site grades, a soil cap and shore stabilization (*e.g.*, rip-rap) will be installed in accordance with 40 CFR 761.61. The cap and shore stabilization will assist in stabilizing surface soils, reduce infiltration into the subsurface and substantially reduce the potential for exposure to PCB-impacted soils not excavated.

The PCB clean-up target of 25 ppm is more stringent than the 100 ppm threshold allowed by EPA in Low Occupancy Areas with the installation of a soil cap. Based on soil test data obtained for the site to date, it is anticipated the 25 ppm target can be reached with reasonable effort. Should shallow groundwater or proximity to the river inhibit reaching the 25 ppm goal, a secondary goal of 100 ppm will be implemented as allowed by EPA with installation of a soil cap.

Area B: Following demolition and removal of the former mill building, PCB-impacted soils ≥1 ppm will be targeted for removal in Area B by a hazardous waste contractor. Prior explorations in this area indicate that a relatively small volume (<20 cubic yards) will require excavation for PCB impacts.

The excavation work in areas A and B will be performed using an excavator and excavated soils will be transferred directly to trucks or roll-off containers lined with polyethylene sheeting for subsequent transport to the disposal facility. Tarps will be used to cover loads prior to transport. Following appropriate waste characterization and coordination with an appropriate disposal facility, the excavated soil will be disposed of in accordance with §761.61(a)(6)(v).

TSCA-regulated remediation waste (≥50 ppm PCBs) will be disposed of at the CWM Chemical Services, LLC facility located in Model City, New York. If segregation is feasible, soils with concentrations of PCBs <50 ppm will be disposed at either the Crossroads special waste landfill in Norridgewock, Maine or the Sawyer landfill in Hamden, Maine.

Post-Excavation Testing

Ransom will document soil conditions in each excavation area following the excavation of PCB-contaminated soil. The soil sampling will be conducted in accordance with §761.61(a)(6). Ransom will collect confirmatory soil samples from the walls and the bases of each of the excavations. If bedrock is encountered at the walls or base, samples will not be collected.

If the excavation is safe to enter, then the sampling will be conducted based on a 1.5-meter grid interval in accordance with the composite soil sampling procedure outlined in 40 CFR 761.289 for point sources of PCB contamination. If the excavation is unsafe to enter, sampling grids will be impossible to set up, and therefore, composite soil samples will be collected by dragging a scoop up the sidewalls and across the base of the excavation. Ransom will make the determination if the excavation is unsafe to enter based on OSHA guidelines.

Soil Cap

In accordance with 40 CFR 761.61, the cap proposed for Area A will consist either of compacted soil with a minimum thickness of 25 cm (10 inches) or concrete or asphalt cap with a minimum thickness of 15 cm (6 inches). Other EPA requirements include:

- The cap will be of sufficient strength to maintain its effectiveness and integrity during the use of the cap surface which is exposed to the environment.
- The cap will not be contaminated at a level ≥1 ppm PCB per AroclorTM (or equivalent) or per congener.
- Repairs will begin within 72 hours of discovery for any breaches which would impair the integrity of the cap.
- The properties of a soil cap include: a) permeability equal to or less than 1×10^{-7} cm/sec; (b) percent soil passing No. 200 Sieve >30; (c) liquid limit >30; and (d) Plasticity Index >15.

Deed Restriction

EPA requires deed restrictions for caps and Low Occupancy Areas within 60 days of completion of a cleanup activity (40 CFR 761.61). If necessary, the owner of the 7 Depot Street site will record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

- That the land in Area A has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in §761.3;

- Of the existence of the cap in Area A and the requirement to maintain the cap;
- The applicable cleanup levels left at the site in Area A, under the cap.

The owner will submit a signed certification to the EPA Regional Administrator that he/she has recorded the notation.

3.1.3 PCB-Impacted Building Materials

Testing has identified PCB-impacted materials inside the former mill at concentrations ranging from about 5 to 138 ppm. Materials tested include soil-like material that has accumulated on top of the concrete floors on the basement level and on the second floor of the building (Figure 2). Other materials possibly impacted by PCBs include concrete and wood in areas where oil stains were observed.

Following additional characterization of building materials for PCBs and EPA approval of the proposed PCB mitigation plan, a hazardous waste disposal contractor will remove PCB-impacted soil build-up and other materials from the building interior and manage the materials as PCB Remediation Waste (40 CFR 761.61). Follow-up testing of remaining concrete and other building surfaces will be conducted to confirm removal of PCB Remediation Waste prior to demolition. Confirmatory testing will be conducted in accordance with Subpart O of 40 CFR 761.61, "Sampling to Verify Completion of Self-Implementing Cleanup and On-Site Disposal of Bulk PCB Remediation Waste and Porous Surfaces."

Bulk waste materials will be tested prior to disposal in accordance with requirements of the disposal facility. TSCA-regulated remediation waste (≥50 ppm PCBs) will be disposed of at the CWM Chemical Services, LLC facility located in Model City, New York. If segregation is feasible, soils with concentrations of PCBs <50 ppm will be disposed at either the Crossroads special waste landfill in Norridgewock, Maine or Sawyers in Hamden, Maine.

3.2 13 Depot Street

3.2.1 Clean-up Goal for Petroleum-Impacted Soils

As detailed in section 3.1.1, MDEP has established a clean-up goal for gasoline-impacted soils at the site of 5 mg/kg GRO (lab result). For soils impacted by heavier oils (fuel oil, kerosene, motor oil), MDEP has assigned a "Baseline-2" goal of 200 to 400 ppm (field screening with a PID).

3.2.2 Soils Excavation

Gasoline-Impacted Soils

A hazardous waste contractor will excavate gasoline-impacted soils in accordance with the clean-up goal. The excavation work will be performed using an excavator and

excavated soils will be transferred directly to trucks or roll-off containers lined with polyethylene sheeting for subsequent transport to the disposal facility. Tarps will be used to cover loads prior to transport. MDEP will be notified at least five working days prior to the start of excavation activities.

Ransom will provide monitoring of soils in the excavation with a photoionization detector (PID) calibrated to the MDEP set point for gasoline impacted soils. Based on recommendations of MDEP, soils with PID readings greater than 50 ppm will be targeted for excavation.

Surface Oil Stains

MDEP has requested removal of surface soils visibly impacted by oil. Past use of the site for automobile parts repair and storage has resulted in areas where surface soils have been impacted by petroleum products such as motor oil and transmission fluid. The hazardous waste contractor will excavate areas of visibly stained surface soils and transfer the soil to a truck or roll-off container. The excavation will be monitored by Ransom who will use a PID to identify soils requiring excavation and off-site disposal/treatment (i.e., soils with PID readings of 200 to 400 ppm).

3.2.3 Excavated Soil Testing and Disposal

For excavated soils impacted by gasoline spilled from the former underground tank, MDEP will provide confirmation that the materials contain "virgin hydrocarbon" and reclamation at an in-state recycling facility is feasible. For excavated soils impacted by motor oil and transmission oil, testing will be conducted in accordance with the requirements of the disposal/treatment facility.

It is anticipated that the excavated petroleum-impacted soil will be reclaimed at Commercial Recycling in Scarborough, Maine. Prior testing of site soils has not identified constituents such as metals or PCBs that would render soils impacted by transmission or motor oil ineligible for reclamation in state.

3.2.4 Post-Excavation Testing

Ransom will document soil conditions in the excavation area following excavation of gasoline-impacted soil. In the area of gasoline-impacted soil excavation, Ransom will collect confirmatory soil samples from the walls and the base of the excavation, and submit the samples for GRO and VOC (EPA Method 8260B) analysis. In the area of heavier oil-impacted soils excavation, Ransom will collect soil samples from the walls and base of the excavation for screening with a PID using the MDEP-approved headspace method.

The number of samples will be contingent upon the size of the excavation and soil types encountered. A minimum of four wall samples and one bottom sample will be collected. If bedrock is encountered at the walls or base, samples will not be collected.

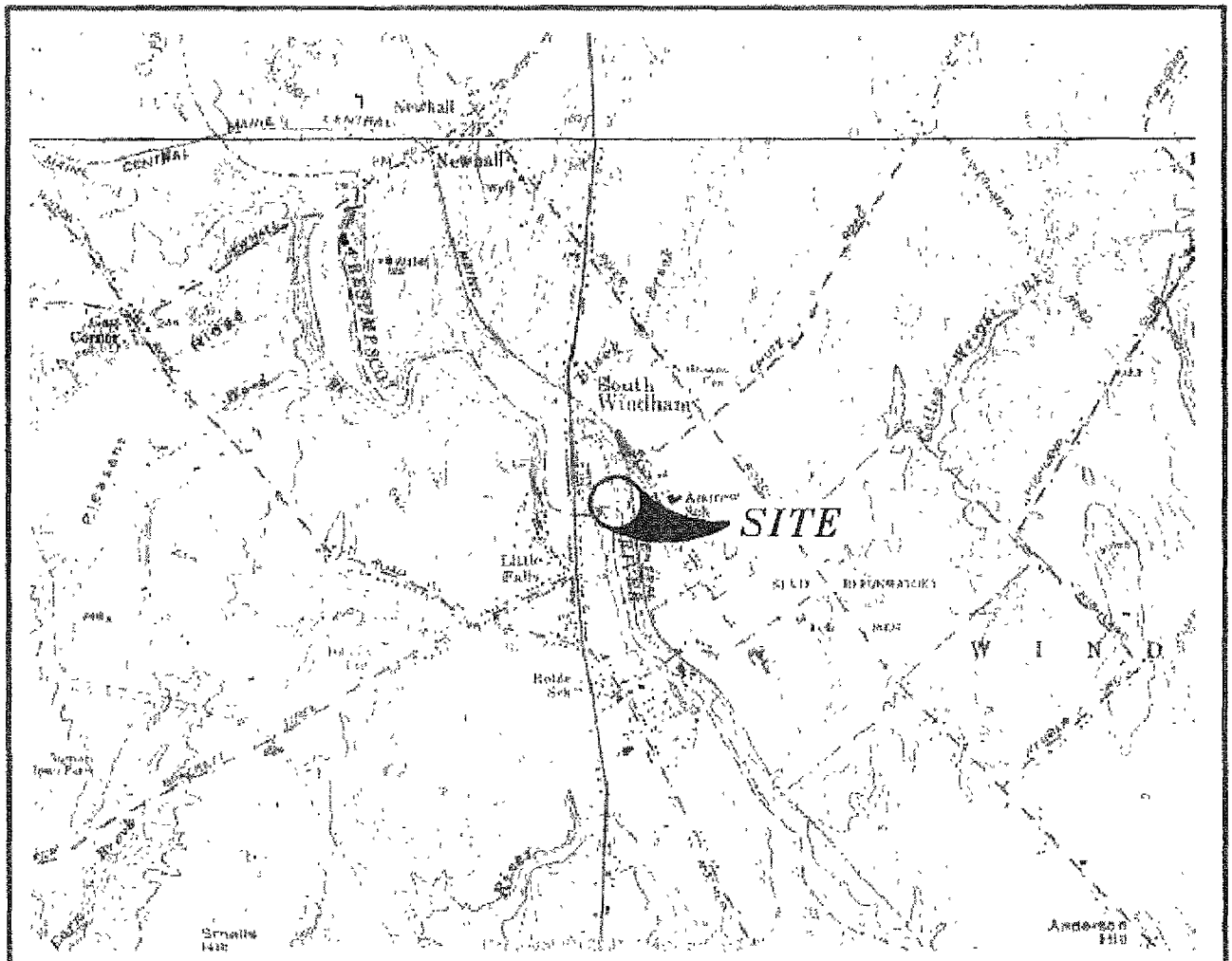
4.0 DOCUMENTATION

Ransom will provide documentation of clean-up for both the 7 and 13 Depot Street parcels for MDEP review. The report will include, at a minimum:

- Site clean-up methodologies
- Photo-documentation of clean-up activities
- Confirmatory test data
- Site restoration measures
- Waste disposal documentation

Upon review and approval of the site clean-up, we understand MDEP will issue a "Certificate of Completion." This certificate documents MDEP concurrence that site clean-up was completed in accordance with the Voluntary Response Action Plan presented herein.

Figures

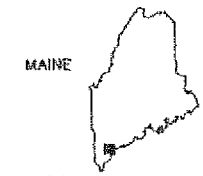


TAKEN FROM U.S.G.S. 7.5x15 MINUTE SERIES TOPOGRAPHIC MAP OF GORHAM, NAINE DATED 1975

CONTOUR INTERVAL IS 3 METERS

SITE COORDINATES: LATITUDE 43°44'06"
LONGITUDE 70°25'32"

UTM COORDINATES: 48: 43: 165mN
03: 85: 220mE



QUADRANGLE LOCATION

SCALE in FEET
1:25,000

RANSOM Environmental Consultants, Inc.

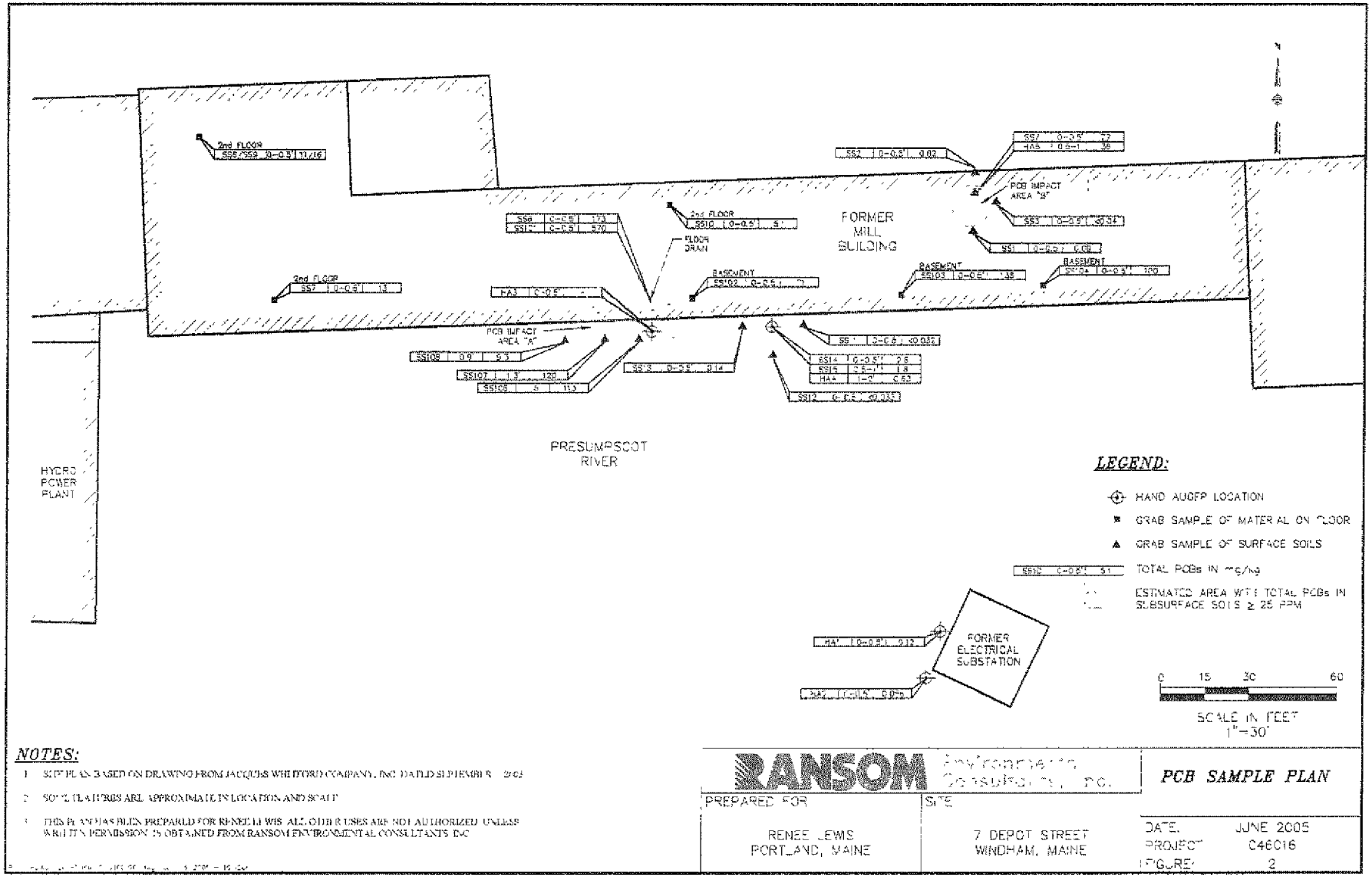
SITE LOCATION MAP

PREPARED FOR:	SITE:	DATE: MAY 2005
RENEE LEWIS PORTLAND, MAINE	7 AND 13 DEPOT STREET WINDHAM, MAINE	PROJECT: 046016 FIGURE: 1

P:\ME-DWGS\2004\046016\046016GO.dwg

VIL_RESP01029

HRC004096



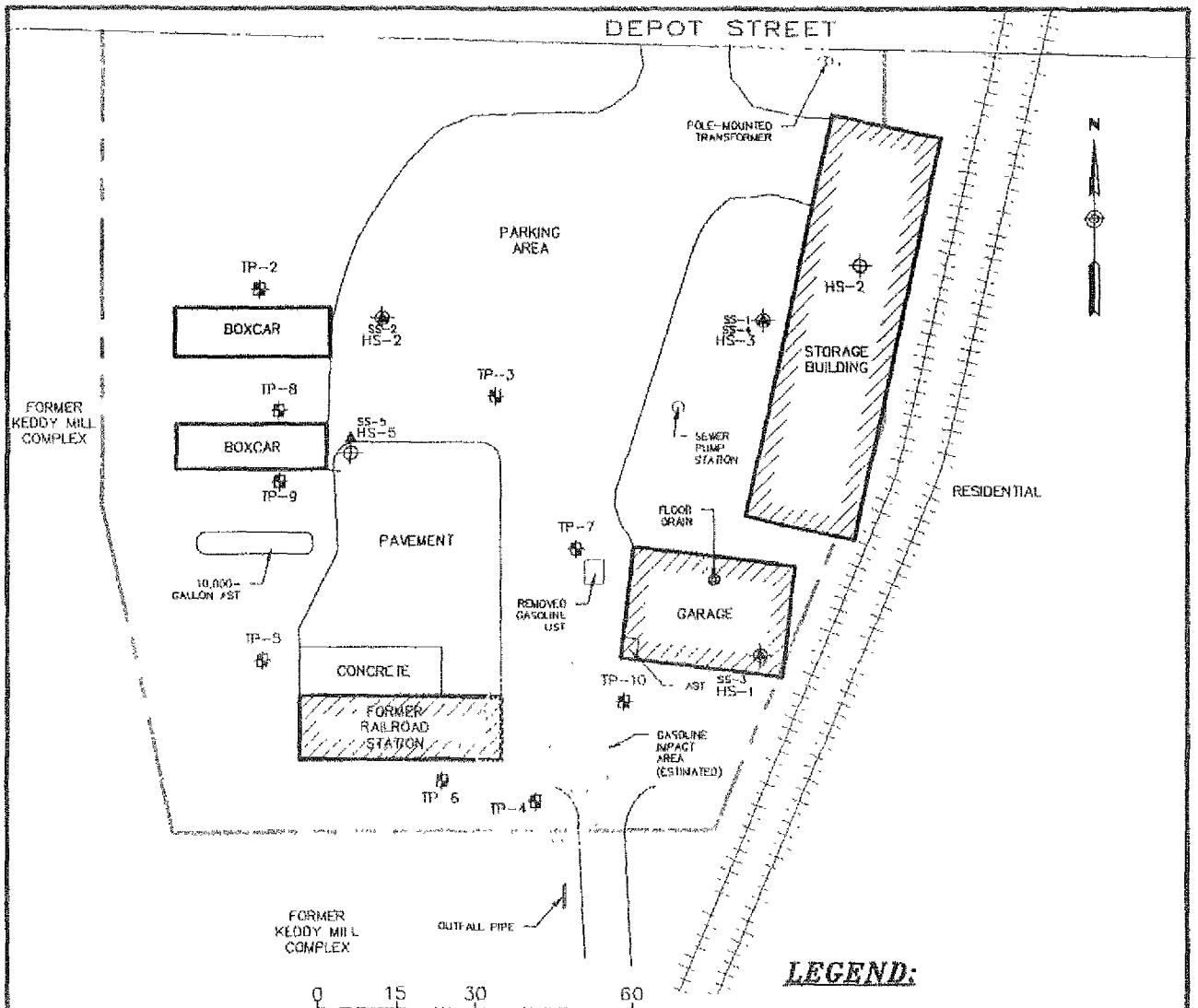
NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER [illegible] 2002
2. SOIL FEATURES ARE APPROXIMATE IN LOCATION AND SCALE
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

RANSOM Environmental Consultants, Inc.

PCB SAMPLE PLAN

PREPARED FOR	SITE		
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: PROJECT: FIGURE:	JUNE 2005 046016 2



LEGEND:

- SS-1 ▲ ⊕ SURFACE SAMPLE
- TP-1 TEST PIT LOCATION
- STREAM
- PROPERTY BOUNDARY
- RAILROAD TRACKS
- ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS > 25 PPM

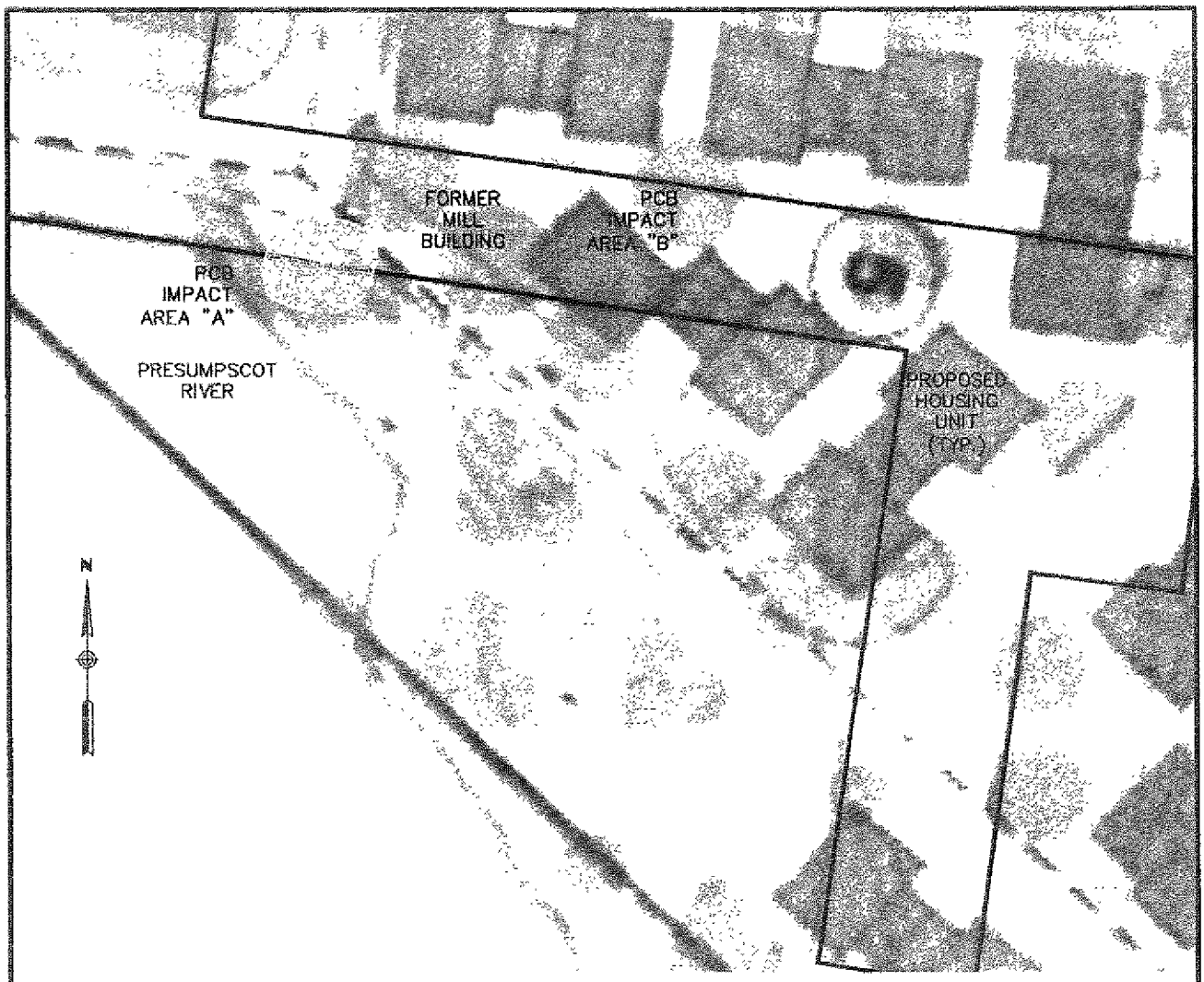
NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED JUNE 2, 2004
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

RANSOM Environmental Consultants, Inc.

EXPLORATION PLAN

PREPARED FOR:	SITE:	DATE: MAY 2005
RENEE LEWIS PORTLAND, MAINE	13 DEPOT STREET WINDHAM, MAINE	PROJECT: 046016 FIGURE: 3



NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

LEGEND:

ESTIMATED AREA WITH TOTAL PCBs IN SUBSURFACE SOILS ≥ 25 PPM

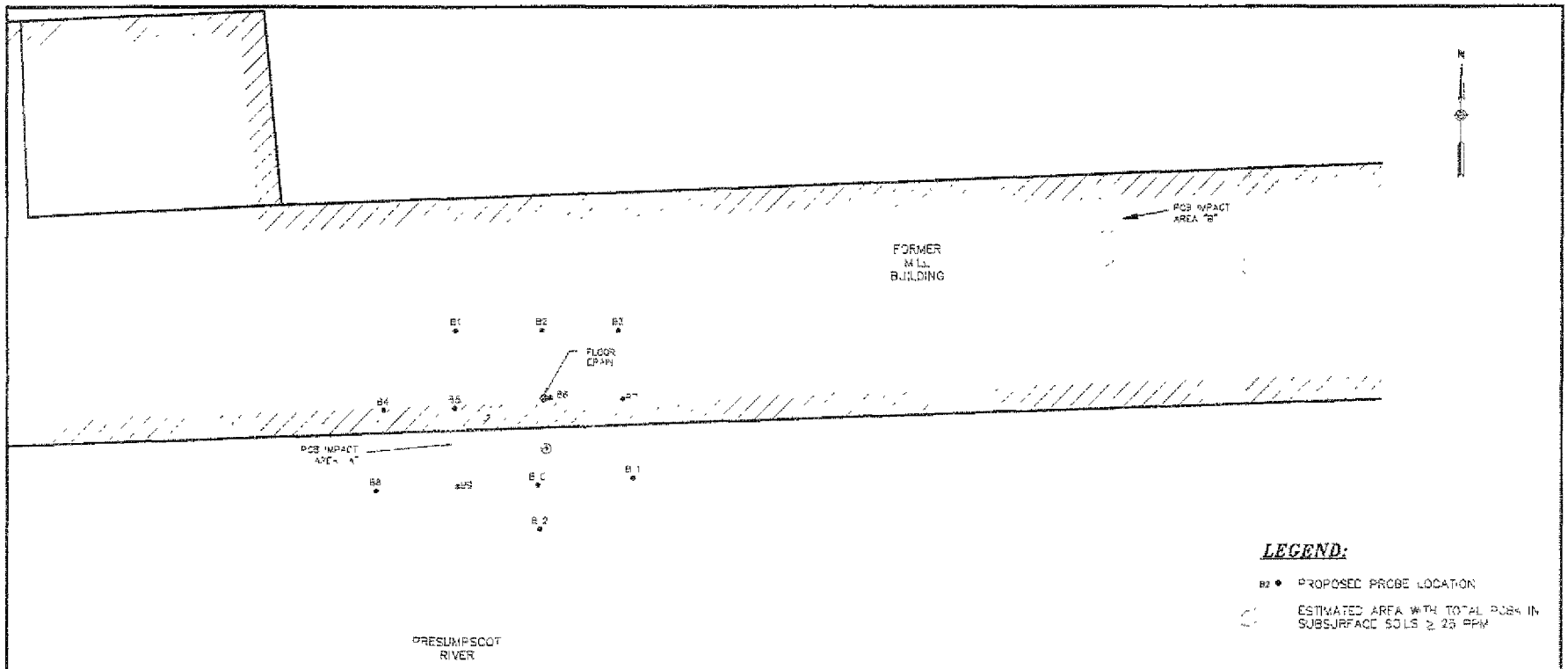
0 25 50 100

SCALE IN FEET
1"=50'

P:\ME-DWGS\2004\046016\046016f1.dwg Jun 03, 2005 - 10:05am

RANSOM Environmental Consultants, Inc.

PREPARED FOR:	SITE:	PROPOSED SITE DEVELOPMENT
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: JUNE 2005 PROJECT: 046016 FIGURE: 4



NOTES:

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC DATED SEPTEMBER 2, 2003
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE
3. THIS PLAN HAS BEEN PREPARED FOR RENEE LEWIS. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC

RANSOM Environmental Consultants, Inc.

PREPARED FOR:	SITE:	PROPOSED BORINGS
RENEE LEWIS PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	DATE: JUNE 2005 PROJECT 046016 FIGURE 5

Appendix A
Data from Jacques Whitford Report

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	TP-101	TP-102	TP-102	TP-103	TP-104	TP-107	TP-107	TP-110
Depth of Sample	Residential	8-10'	0-2'	4-6'	0-2'	10-12'	2-4'	8-10'	0-2'
Date Collected	Guideline	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003
DRO (mg/kg)									
DIESEL RANGE ORGANICS		10	NA	NA	NA	U 6 8	NA	9	NA
Metals (mg/kg)									
ARSENIC	10	NA	16	5	11	NA	3	NA	16
BARIUM	10,000	NA	45	98	75	NA	87	NA	81
CADMIUM	27	NA	U 8.78	U 1.00	U 4.69	NA	U 1.06	NA	U 1.00
CHROMIUM	950	NA	266	7	133	NA	18	NA	16
LEAD	375	NA	150	12	164	NA	24	NA	49
MERCURY	60	NA	0	U 0.048	0	NA	0	NA	0
SELENIUM	950	NA	U 8.8	U 1 0	U 4.7	NA	U 1.1	NA	U 1.0
SILVER	950	NA	U 1.5	U 1 5	U 1.5	NA	U 1.6	NA	U 1.5
PCBs (ug/kg)									
AROCLOR-1016	100	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1221	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1232	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1242	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1248	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1254	*	NA	NA	NA	NA	NA	NA	NA	NA
AROCLOR-1260	*	NA	NA	NA	NA	NA	NA	NA	NA
Total PCBs (sum of above)	2,200	NA	NA	NA	NA	NA	NA	NA	NA
VOCs (ug/kg)									
METHYLENE CHLORIDE	13,000	17	NA	NA	NA	7	NA	10	NA
TRICHLOROFLUOROMETHANE	*	190	NA	NA	NA	70	NA	68	NA
Other Compounds									
TOTAL SOLIDS (%)	*	73	92	84	88	74	84	80	90

Notes:

* Regulatory Guideline Not Available

Bold values indicate an exceedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	TP-111	TP-112	HA-1	HA-2	HA-4	HA-5	HA-6	SS1
Depth of Sample	Residential	2-4'	0-2'	0-0.3'	0-0.3'	1-2'	0.5-1'	0-0.3'	0-0.5'
Date Collected	Guideline	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/4/2003	8/8/2003	8/4/2003	11/25/2003
DRO (mg/kg)									
DIESEL RANGE ORGANICS		29	NA	63	NA	2,900	3,300	9,100	NA
Metals (mg/kg)									
ARSENIC	10	NA	**22**	NA	NA	NA	NA	NA	NA
BARIUM	10,000	NA	251	NA	NA	NA	NA	NA	NA
CADMIUM	27	NA	U 2.21	NA	NA	NA	NA	NA	NA
CHROMIUM	950	NA	55	NA	NA	NA	NA	NA	NA
LEAD	375	NA	338	NA	NA	NA	NA	NA	NA
MERCURY	60	NA	1	NA	NA	NA	NA	NA	NA
SELENIUM	950	NA	U 2.2	NA	NA	NA	NA	NA	NA
SILVER	950	NA	U 1.6	NA	NA	NA	NA	NA	NA
PCBs (ug/kg)									
AROCLOR-1016	100	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1221	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1232	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1242	*	NA	NA	U 20	U 20	99	U 200	NA	U 39.0
AROCLOR-1248	*	NA	NA	U 20	U 20	U 18	U 200	NA	U 39.0
AROCLOR-1254	*	NA	NA	79	56	530	24,000	NA	89.9
AROCLOR-1260	*	NA	NA	40	U 20	U 18	12,000	NA	U 39.0
Total PCBs (sum of above)	2,200	NA	NA	119	56	629	**36,000**	NA	90
VOCs (ug/kg)									
METHYLENE CHLORIDE	13,000	U6	NA	NA	NA	NA	NA	6	NA
TRICHLOROFLUOROMETHANE	*	61	NA	NA	NA	NA	NA	48	NA
Other Compounds									
TOTAL SOLIDS (%)	*	84	79	85	83	93	84	96	83.6

Notes:

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PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS2	SS3	SS5	SS6	SS7	SS8	SS9
Depth of Sample	Residential	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'
Date Collected	Guideline	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	NA	NA	NA
BARIUM	10,000	NA	NA	NA	NA	NA	NA	NA
CADMIUM	27	NA	NA	NA	NA	NA	NA	NA
CHROMIUM	950	NA	NA	NA	NA	NA	NA	NA
LEAD	375	NA	NA	NA	NA	NA	NA	NA
MERCURY	60	NA	NA	NA	NA	NA	NA	NA
SELENIUM	950	NA	NA	NA	NA	NA	NA	NA
SILVER	950	NA	NA	NA	NA	NA	NA	NA
PCBs (ug/kg)								
AROCLOR-1016	100	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	**3,210**
AROCLOR-1221	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1232	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1242	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1248	*	U 36.1	U 40	U 39.2	U 48.2	U 33.1	U 54.6	U 47.6
AROCLOR-1254	*	500	U 40	44,800	120,000	13,100	11,200	9,590
AROCLOR-1260	*	317	U 40	32,200	53,500	U 33.1	U 54.6	3,540
Total PCBs (sum of above)	2,200	817		**77,000**	**173,500**	**13,100**	**11,200**	**16,340**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	83	81.2	80.8	68.5	95.5	90.3	90.4

Notes:

* Regulatory Guideline Not Available

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PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

HRC004104

VIL_RESP01037

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS10	SS11	SS12	SS13	SS14	SS15	SS101
Depth of Sample	Residential	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0-0.5'	0.5-1.0'	fl. drain
Date Collected	Guideline	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	11/25/2003	1/13/2004
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	NA	NA	**17.5**
BARIUM	10,000	NA	NA	NA	NA	NA	NA	126
CADMIUM	27	NA	NA	NA	NA	NA	NA	<0.651
CHROMIUM	950	NA	NA	NA	NA	NA	NA	158
LEAD	375	NA	NA	NA	NA	NA	NA	109
MERCURY	60	NA	NA	NA	NA	NA	NA	<0.243
SELENIUM	950	NA	NA	NA	NA	NA	NA	<3.91
SILVER	950	NA	NA	NA	NA	NA	NA	<2.61
PCBs (ug/kg)								
AROCLOR-1016	100	U 43.9	U 32.2	U 32.5	U 35.1	**499**	**222**	<4410
AROCLOR-1221	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1232	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1242	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1248	*	U 43.9	U 32.2	U 32.5	U 35.1	U 43.8	U 37.2	<4410
AROCLOR-1254	*	5,100	U 32.2	U 32.5	135	1770	**1170**	262,000
AROCLOR-1260	*	U 43.9	U 32.2	U 32.5	U 35.1	532	445	<4410
Total PCBs (sum of above)	2,200	**5,100**			135	**2,801**	1,837	**262,000**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	88.9	92.2	95.3	98.2	84.2	90.5	70.9

Notes:

* Regulatory Guideline Not Available

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VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS101 (dup)	SS102	SS103	SS104	SS105	SS106	SS107
Depth of Sample	Residential	fl. drain	soil on fl.	soil on fl.	soil on fl.	1'	1.5'	1.3'
Date Collected	Guideline	1/13/2004	1/13/2004	1/13/2004	1/13/2004	1/13/2004	1/13/2004	2/3/2004
DRO (mg/kg)								
DIESEL RANGE ORGANICS		NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
ARSENIC	10	NA	NA	NA	NA	**13.6**	NA	NA
BARIUM	10,000	NA	NA	NA	NA	73.4	NA	NA
CADMIUM	27	NA	NA	NA	NA	<0.714	NA	NA
CHROMIUM	950	NA	NA	NA	NA	32	NA	NA
LEAD	375	NA	NA	NA	NA	212	NA	NA
MERCURY	60	NA	NA	NA	NA	0.25	NA	NA
SELENIUM	950	NA	NA	NA	NA	<4.28	NA	NA
SILVER	950	NA	NA	NA	NA	<2.86	NA	NA
PCBs (ug/kg)								
AROCLOR-1016	100	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1221	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1232	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1242	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1248	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
AROCLOR-1254	*	570,000	71,100	138,000	100,000	NA	113,000	120,000
AROCLOR-1260	*	<31,000	<6680	<29,800	<29,900	NA	<40,900	<2300
Total PCBs (sum of above)	2,200	**570,000**	**71,100**	**138,000**	**100,000**	NA	**113,000**	**120,000**
VOCs (ug/kg)								
METHYLENE CHLORIDE	13,000	NA	NA	NA	NA	NA	NA	NA
TRICHLOROFLUOROMETHANE	*	NA	NA	NA	NA	NA	NA	NA
Other Compounds								
TOTAL SOLIDS (%)	*	54.9	92.6	94.9	90.9	68.2	67.1	73.4

Notes:

* Regulatory Guideline Not Available

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VOCs = Volatile Organic Compounds

NA = Not Analyzed

7 Depot Street
Windham, Maine
Soil Analytical Results

Analyte	Maine DEP	SS108
Depth of Sample	Residential	0.9'
Date Collected	Guideline	2/3/2004
DRO (mg/kg)		
DIESEL RANGE ORGANICS		NA
Metals (mg/kg)		
ARSENIC	10	NA
BARIUM	10,000	NA
CADMIUM	27	NA
CHROMIUM	950	NA
LEAD	375	NA
MERCURY	60	NA
SELENIUM	950	NA
SILVER	950	NA
PCBs (ug/kg)		
AROCLOR-1016	100	<140
AROCLOR-1221	*	<140
AROCLOR-1232	*	<140
AROCLOR-1242	*	<140
AROCLOR-1248	*	<140
AROCLOR-1254	*	9,300
AROCLOR-1260	*	<140
Total PCBs (sum of above)	2,200	**9,300**
VOCs (ug/kg)		
METHYLENE CHLORIDE	13,000	NA
TRICHLOROFLUOROMETHANE	*	NA
Other Compounds		
TOTAL SOLIDS (%)	*	61.8

Notes:

* Regulatory Guideline Not Available

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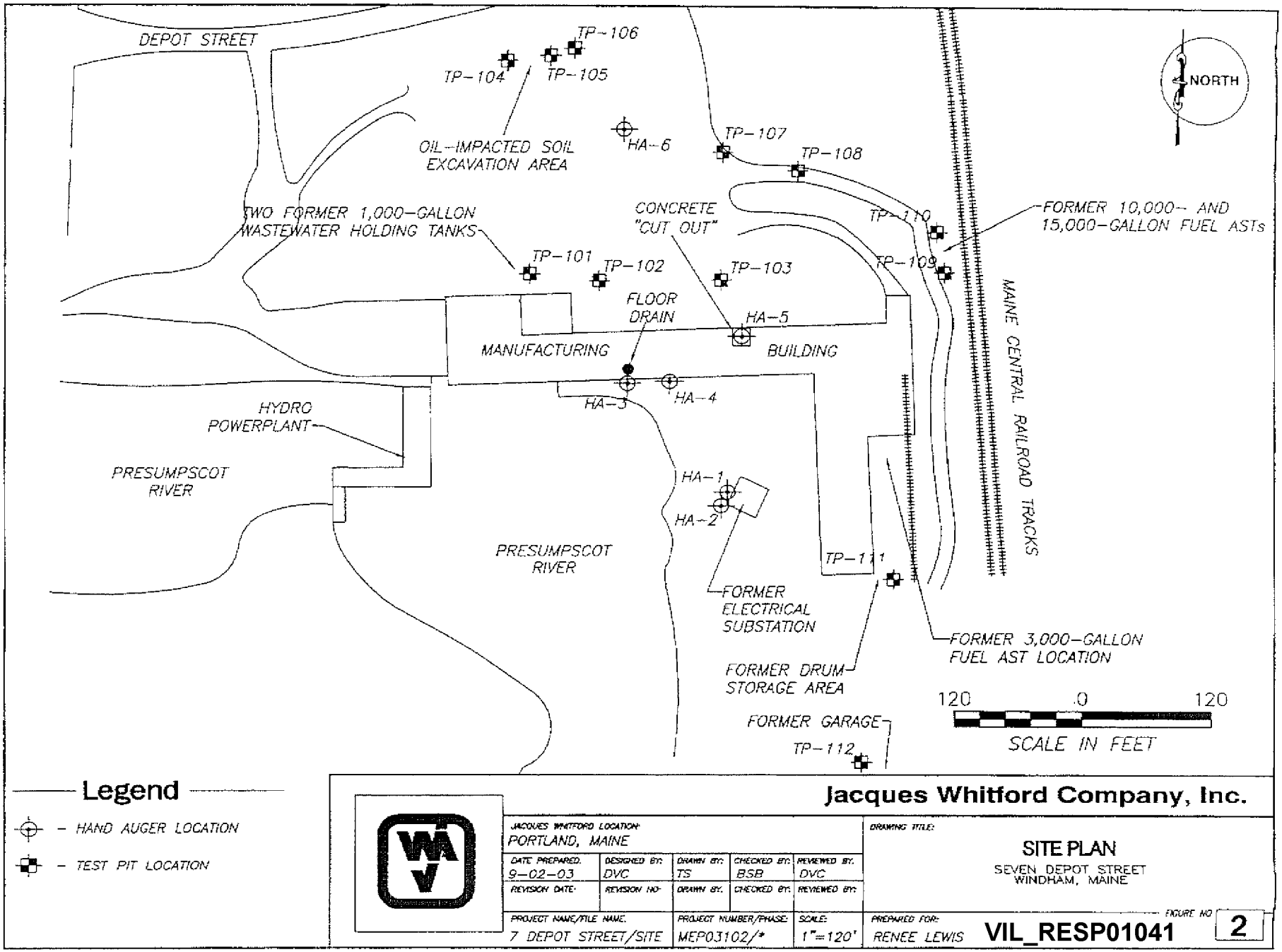
VOCs = Volatile Organic Compounds

NA = Not Analyzed


DEPOT STREET
TP-106
TP-104
TP-105
OIL-IMPACTED SOIL EXCAVATION AREA
HA-6
TP-107
TP-108
NORTH
TWO FORMER 1,000-GALLON WASTEWATER HOLDING TANKS
CONCRETE "CUT OUT"
TP-110
FORMER 10,000- AND 15,000-GALLON FUEL ASTs
TP-101
TP-102
TP-103
TP-109
MAINE CENTRAL RAILROAD TRACKS
FLOOR DRAIN
HA-5
MANUFACTURING BUILDING
HA-3
HA-4
HYDRO POWERPLANT
PRESUMPSCOT RIVER
HA-1
HA-2
PRESUMPSCOT RIVER
TP-111
FORMER ELECTRICAL SUBSTATION
FORMER 3,000-GALLON FUEL AST LOCATION
FORMER DRUM STORAGE AREA
120 0 120
FORMER GARAGE
TP-112
SCALE IN FEET
Legend
- HAND AUGER LOCATION
- TEST PIT LOCATION
Jacques Whitford Company, Inc.
JACQUES WHITFORD LOCATION: PORTLAND, MAINE
DRAWING TITLE: SITE PLAN
SEVEN DEPOT STREET
WINDHAM, MAINE
DATE PREPARED: 9-02-03
DESIGNED BY: DVC
DRAWN BY: TS
CHECKED BY: BSB
REVIEWED BY: DVC
REVISION DATE:
REVISION NO:
DRAWN BY:
CHECKED BY:
REVIEWED BY:
PROJECT NAME/FILE NAME: 7 DEPOT STREET/SITE
PROJECT NUMBER/PHASE: MEP03102/*
SCALE: 1"=120'
PREPARED FOR: RENEE LEWIS
VIL_RESP01041
FIGURE NO 2

HRC004108

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAWN R. GALLAGHER
COMMISSIONER

November 9, 2005

Village at Little Falls, LLC
c/o Renee Lewis
2 Market Street, 6th Floor
Portland, Maine 04101

Re: Village at Little Falls Property, 7 & 13 Depot Street, South Windham, Maine-Voluntary Response Action Program No Action Assurance Letter

Ms. Lewis:

The Maine Department of Environmental Protection ("Department") has received and reviewed your application to the Department's Voluntary Response Action Program ("VRAP"), along with the environmental site assessment reports submitted by your environmental consultant for the project, Ransom Environmental Consultants, Inc. ("Ransom"). The application was submitted to the Department with the request that Village at Little Falls, LLC and Lumis, Inc., as applicants to the VRAP, receive the protections provided by the VRAP Law.

Based on the information presented in the reports, the Department agrees with the conclusions and recommendations for further actions at the property. The remedial actions include provisions for the excavation and disposal of petroleum and polychlorinated biphenyl ("PCB") contaminated soils, as well as the appropriate encapsulation of some of the PCB contaminated soils as described in the "Voluntary Response Action Plan for Village at Little Falls, LLC, South Windham, Maine", authored by Ransom and dated June 8, 2005.

The Department's concurrence with the proposed actions is conditioned on the prohibition of installation of groundwater extraction wells on the property without the permission of the Department.

Provided that the remedial actions are completed to the satisfaction of the Department, Village at Little Falls, LLC, Lumis, Inc., and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at 7 and 13 Depot Street, identified as Lots 6, 7 and 8 on Windham Tax Map 38, and described in Book 1681, Page 99, and Book 18046, Page 32 of the Cumberland

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: [illegible]

web site: www.maine.gov/dep

County Registry of Deeds. The Department will take no action against Village at Little Falls, LLC, Lumis, Inc., and those persons identified in 38 M.R.S.A. § 343-E(6).

Once the recommended remedial measures to be implemented at the property are completed, a report demonstrating the successful implementation of the tasks should be forwarded to the VRAP. Upon determining successful conclusion of the remedial tasks, the Department will issue to Village at Little Falls, LLC and Lumis, Inc. a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please feel free to call me at 207-287-4854.

Sincerely,

Nicholas J. Hodgkins
Division of Remediation
Bureau of Remediation & Waste Management

Pc: D. Todd Coffin, Ransom
Jon Woodard, Maine DEP

PLAN FOR
SELF-IMPLEMENTING CLEANUP OF
PCB REMEDIATION WASTE – PHASE I
7 DEPOT STREET
SOUTH WINDHAM, MAINE

Prepared for:

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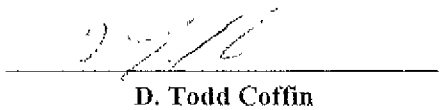

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1.0 INTRODUCTION

On behalf of Village at Little Falls, LLC, Ransom Environmental Consultants, Inc. (Ransom) has prepared this notification for self-implementation of Polychlorinated Biphenyl (PCB) Remediation Waste identified at the former Keddy Mill, located at 7 Depot Street in South Windham, Maine (the Site). PCB Remediation Waste has been identified both inside the Site Building and at the exterior of the Site. Ms. Renee Lewis, representative of Village at Little Falls, LLC, is authorized to signed the certification statement required by §761.61(a)(3)(E). Her contact information is:

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The certification statement is attached as Appendix A. A Site Location Map is attached as Figure 1.

Based on the characterization activities performed at the Site, Ransom determined that interior building surfaces and soils beneath and exterior to the building are PCB-contaminated. The source of the PCBs identified at portions of the interior of the Site Building originated from:

1. Release(s) of PCB-mineral oil dielectric fluid (PCB-MODF) from electrical equipment located within the mill building;

2. Tracking of PCB-MODF onto surfaces in parts of the Site Building where PCB-MODF oil spills had not necessarily occurred; and

3. PCB-contaminated fuel oil that remains in distribution piping inside the mill building, and in some areas has leaked onto floors and walls from this piping.

PCB-contaminated soils were identified in three areas:

1. In, and adjacent to, a sump located in the basement of the former Melt Building;

2. On the ground floor of the Melt Building where broken concrete flooring has exposed sub-grade soils; and

3 On the ground floor of the Storage and Manufacturing portion of the building where broken concrete flooring has exposed sub-grade soils.

Village at Little Falls, LLC intends to remediate PCB-contaminated concrete floors and walls such that PCB concentrations remaining in concrete and other porous materials are reduced to 1 milligram/kilogram (mg/kg) or less. PCB-contaminated soil beneath and exterior to the Site building will be remediated in accordance with 40 CFR 761.61, and appropriate classification of "Low Occupancy" or "High Occupancy" areas.

PCB clean-up at the Site will be undertaken in three phases, each in accordance with the (United States Environmental Protection Agency's (EPA's) self-implementing procedure under §761.61(a):

Phase I – Building Interior Sludge, Dirt/debris and Oily Materials

The initial phase of PCB mitigation involves clean-up of sludge, dirt/debris and oily materials that have accumulated on floors and walls inside the former mill building. This plan addresses cleanup of sludge, dirt/debris, and oily materials containing PCBs inside the building.

Phase II – Building Interior Porous Surfaces

Following removal of the interior sludge, dirt/debris and oily materials, sampling and testing of porous concrete and wood surfaces will be undertaken to determine additional mitigation requirements. Many of these surfaces are covered with a layer of sludge, dirt/debris or oily materials, thus it is proposed that the sludge, dirt/debris and oily materials are removed and properly disposed prior to sampling of the underlying porous surface. This approach will allow improved visual identification of stained surfaces and permit more representative sampling of the porous material for PCB impacts. A separate plan will be presented that details the supplemental testing and methodology for mitigation of interior porous surfaces.

Phase III – Soils

Preliminary testing has identified PCBs in soils both exterior to and beneath the site building. Due to restricted access, additional sampling and testing of soils will be undertaken following partial demolition of the Site Building. A separate plan will be presented that details the supplemental testing and methodology for mitigation of site soils.

The remediation work proposed in this Plan is being undertaken by Village at Little Falls, LLC in order to initiate Site redevelopment activities which include demolition of the former mill building. To facilitate the remediation of this facility, Ransom and Village at Little Falls, LLC respectfully request that this Plan be reviewed and approved by the EPA by May 28, 2006 (30 days from submittal).

The Maine Department of Environmental Protection (MEDEP) has reviewed and approved a Voluntary Response Action Plan (VRAP) dated June 8, 2005, and has issued a "No Action Assurance Letter" to Village at Little Falls, LLC and Lumas, Inc. (site owner). The VRAP details the Site background, Site investigation findings and the proposed mitigation plan. MEDEP will issue a "Certificate of Closure" following completion of Site mitigation and review of associated documentation.

2.0 BACKGROUND

2.1 Site Description

The Site consists of a former steel mill located on 7 Depot Road in South Windham, Maine (refer to Figure 1). The approximately 6.5 parcel is bordered by Depot Street acre to the North, Maine Central Railroad tracks to the east, the Presumpscot River to the South and Route 202 to the West. The site was reportedly first developed for industrial use in the 1700s, and over the years uses included a saw mill, grist mill, manufactured wood board mill and the steel mill whose remnants presently occupy the site.

The site is presently occupied by a former mill building constructed primarily of concrete and brick. The majority of the building consists of two levels, including a ground floor/basement that is partially below grade. Structures were added to the building over the years, and historic site plans denote the following uses: boiler house, generator room, press building, melt building, storage and manufacturing, and offices. The forge shop and boiler house have been razed.

2.2 Summary of Previous Investigation Activities

The property has been the focus of several environmental investigations since 1995. The investigation reports reviewed by Ransom include the following:

1. Phase I Limited Environmental Assessment, Lot 7 of Map 38, Windham Township, South Windham, Cumberland County, Maine, by Consla Geotechnical Engineering, March 18, 1993.

2. Environmental Site Assessment, Phase I & II, Former Steel Mill Property, Route 202 and Depot Street ,Windham, Maine, by S.W. Cole Engineering, Inc., November 17, 1997.

3. Report on Supplemental Site Investigation, 7 Depot Street, Windham, Maine by Jacques Whitford Company, Inc., March 9, 2004.

The Phase I Limited Environmental Assessment by Consla Geotechnical Engineering identified potential sources of environmental impacts but included no subsurface investigation or chemical testing of soils, sludge or other materials at the Site. The assessment identified numerous tanks, chemical storage containers and operations areas that had the potential to impact the site environment.

Subsurface investigations by S. W. Cole in 1995 and 1996 included completion of twenty-four test pits targeting former storage tanks and other areas of potential concern. Soil samples were screened for volatile organic compounds (VOCs) with a photoionization detector (PID) and six soil samples were tested in a laboratory either for fuel oil, pesticides, PCBs, or heavy metals.

S. W. Cole identified heavy oil-impacted soil at the northern end of the site near Depot Street. The impacted soil was located in the vicinity of a two former above-ground heavy oil storage tanks (now removed). S. W. Cole removed approximately 11 tons of soil impacted by the heavy oil under the oversight of the MEDEP. S. W. Cole identified no significant impacts from pesticides, PCBs or heavy metals during their Site investigation.

In August, 2003, Jacques Whitford completed supplemental investigations including twelve test pits, six hand augers and twenty-three surface soil samples at the 7 Depot Street site to evaluate areas of potential concern identified during previous site investigations. These areas included:

- Two former above ground fuel storage tanks (15,000 and 10,000 gallon capacity) near the railroad tracks on the east side of the site where oil-stained soils were observed during a previous site investigation;
- Two 1,000 gallon underground wastewater tanks adjacent to the north wall of the facility;
- Former 3,000 gallon above-ground fuel tank located at the end of a rail spur on the east side of the site;
- Transformer pad/electrical substation on the south side of the site;
- Former drum storage area at the south end of the former mill building;
- Former garage at the south end of the site; and
- A sump and area of broken concrete in the basement of the former Melt Building.

Selected soil samples were tested for VOC's (EPA Method 8260-B), diesel-range organics (DRO), the eight RCRA metals, and PCBs. Sampling by Jacques Whitford also included testing of sludge and dirt/debris from floor surfaces inside the mill building for PCBs. The interior PCB sample locations Sampled by Jacques Whitford are shown on Figures 2 and 3, and included:

Sample ID	Location/Rationale
SS5	Material from area of broken concrete in Melt Building Basement
SS6	Material from floor sump in Melt Building Basement
SS7	Sludge on concrete floor in maintenance shop, first floor
SS8/SS9	Sludge on concrete floor in maintenance shop, first floor
SS10	Sludge on concrete floor near former transformer, first floor
SS101A/B	Material from floor sump in Melt Building Basement
SS102	Dirt/debris pile on concrete floor in Melt Building Basement
SS103	Dirt/debris pile on concrete floor in Melt Building Basement
SS104	Dirt/debris pile on concrete floor in Melt Building Basement

Jacques Whitford collected sample SS5 from an area of broken concrete in the basement of the former Melt Building. Samples SS6 and SS101 were collected from a floor sump along the south wall in the Melt Building. The sump was about 1.5 ft x 1.5 ft square and contained water at a depth of about 2 ft below the floor level. Hand excavation along the building wall did not identify a discharge pipe from the drain. Jacques Whitford indicated that the drain may have an open bottom or sides under the building floor, with no point discharge.

Samples SS7, SS8/SS9 (co-located samples), SS10, SS102, SS103, and SS104 were composed of sludge that had accumulated on the building's concrete floor. Sample locations were selected based on proximity to oil stains, maintenance activities and former electrical equipment, such as transformers.

Total PCBs concentrations of 174 ppm (Aroclor 1254 and Aroclor 1260) were detected in material collected from the floor sump located along the south wall of the building basement/ground floor (SS6). Confirmatory sampling from this location indicated 262 ppm PCBs (SS101A) and 570 ppm PCBs (SS101B – split sample). The area of broken concrete (SS5) contained 77 mg/kg total PCBs.

Material sampled from the surface of the concrete floor inside the building contained total PCBs ranging from 11 ppm in the maintenance shop (SS8) to 138 ppm on the ground floor of the Melt Building (SS103). The PCBs detected included Aroclor 1254 and 1260.

2.3 Surrounding Receptors

Public water is available to the site area. However, Portland Water District records for South Windham indicate that a number of residences generally east of the site have private water supply wells. The closest wells to the site include the Boulanger, Georgatos and Reed residences, located about 500 to 1,000 feet to the northeast. Site topography indicates these residences are located at an elevation 20 to 40 feet higher than the site and are likely upgradient with respect to groundwater flow.

The Presumpscot River borders the site to the west, and properties to the north, east and south consist of a mix of commercial, industrial and residential properties. The closest residence to the site is an abutting apartment building about 300 feet east of the mill building. Ransom has identified no schools, playgrounds or day care facilities within 500 feet of the Site

3.0 SITE CHARACTERIZATION BY RANSOM

Based on the results of the prior Site investigations, Ransom conducted additional characterization of materials inside the mill building for PCBs. The sampling program included the following:

1. Collection of surface wipe samples to assess possible tracking of PCBs into a first floor hallway and office/storage areas at the south end of the mill building.

2. Collection of bulk samples of solid material from the top of concrete floors in the basement and first floor of the Melt Building, the first floor Storage and Manufacturing area, the Press Building (ground floor) and press pit (ground floor);

3. Collection of bulk samples of oily material from the concrete floor and walls in the basement and first floor of the Melt Building, and from the first floor of the Storage and Manufacturing building;

4. Collection of sub-slab material where concrete had been broken in the vicinity of two transformers (in storage) on the first floor of the mill building; and

5. Collection of wood chips from oil-stained wood in the vicinity of electrical equipment in the basement (Generator Room) and first floor of the Melt Building.

The samples collected during Ransom's investigation were analyzed by Pace Analytical, Inc. (Pace) of Pittsburgh, PA for PCBs by U.S. EPA Method 8082. Bulk samples were extracted using US EPA Method 3540 (Soxhlet Extraction) and the wipe samples were extracted using a modified Method 3550 (sonication). The sample results are summarized on Table 1; laboratory data sheets including QA/QC reports are provided in Appendix B.

3.1 Surface Wipe Samples

Ransom collected three surface wipe samples (IW-01 through IW-03) from concrete floors in a first floor hallway and in the office/laboratory space (second floor) at the south end of the mill building on October 27, 2005. Each sample was collected in accordance with the standard wipe test as defined by §761.123. Wipe sampling locations are depicted on Figures 3 and 4.

PCBs were not detected in wipe samples IW-02 (2nd floor office area) and IW-03 (1st floor hall). Aroclor 1254 and Aroclor 1260 were detected at a total concentration of 44 µg/100 cm^2 in IW-01 (2nd floor stockroom).

3.2 Bulk Solids on Walls and Floors

Ransom collected ten samples of bulk solids from the top of concrete floors in the former mill building on October 27 and November 2, 2005 (refer to Figures 2 and 3). The samples included:

- Melt Building basement (IS-09 and duplicate IS-13)
- First floor of the Melt Building (IS-10, IS-11 and IS-14)
- Ground floor of the Storage and Manufacturing area (IS-06)
- First floor of the Storage and Manufacturing area (IS-01 and IS-02)
- Press Building (IS-07 and IS-08).

Total PCBs were detected at concentrations ranging from non-detect in the Press Building (IS-08) to 320 mg/kg on the first floor of the Storage and Manufacturing area (IS-02). Four of the ten samples contained total PCBs with concentrations greater than 50 mg/kg The PCBs detected were Aroclor 1248, 1254 and 1260.

3.3 Oily Material

Ransom collected six samples of oily material associated with fuel distribution piping in the Melt Building The piping includes fuel supply and return lines extending from the south end of the Melt Building basement to the Storage and Manufacturing area at the north end of the mill building. The oil samples appeared to consist of a heavy heating oil (No. 6/Bunker C) and included:

- Oil on the wall of the Melt Building basement, near fuel piping (IS-03)
- Oil on the concrete floor beneath a fuel pipe cutoff ((IS-04)
- Oil on the wall of a former furnace in the basement of the Melt Building (IS-15)
- Oil that had leaked from a fuel pipe fitting on the first floor of the Melt Building (IS-16)
- Oil that had leaked from a fuel piping elbow on the first floor of the Melt Building (IS-17)
- Oil that had leaked from a fitting in an apparent fuel pump on the first floor of the Storage and Manufacturing area (IS-18).

Samples IS-03 and IS-04 were collected on October 27, 2005. Samples IS-15 through IS-18 were collected on January 2, 2006. The sample the locations are shown on Figures 2 and 3.

Total PCBs in the oily materials were detected at concentrations ranging from non-detect in IS-18 to 240 mg/kg in IS-15. Two of the six samples of oil materials contained PCBs at concentrations greater than 50 mg/kg. PCB constituents included Aroclor 1242, Aroclor 1248 and Aroclor 1254.

3.4 Sub-Slab Sample

Ransom collected one bulk sub-slab sample (IS-05) of fill from an area of broken concrete flooring in the Storage and Manufacturing area on October 27, 2005. The sample location is shown on Figure 2.

The soil sample contained total PCBs at a concentration of 97 mg/kg. The constituents were Aroclor 1254 (66 mg/kg) and Aroclor 1260 (31 mg/kg).

3.5 Bulk Wood Samples

Ransom collected two samples of oil-stained wood in transformer areas, one from a platform in the former Generator Room (IWD-02), and one from a platform on the first floor of the Melt Building (IWD-01). Sample locations are shown on Figures 2 and 3.

The two wood chip samples contained total PCBs of 36.9 mg/kg (IWD-01) and 105 mg/kg (IWD-02) Aroclor 1242, 1254 and 1260 were identified.

3.6 Data Usability/Validation

To assess the usability/validity of the laboratory data obtained during the investigation work described above, Ransom conducted a limited data validation assessment. This assessment included an evaluation of the following parameters as provided in the laboratory reports:

1. Sample integrity;
2. Laboratory information.
3. Chain of custody;
4. Laboratory report details; and
5. Quality Assurance/Quality Control.

During the validation process, Ransom reviewed the laboratory analytical reports and completed a Laboratory Report Checklist documenting the performance of the validation. Ransom did not identify laboratory quality-control issues that may have had an adverse impact on the usability of the data.

3.7 Determination of PCB Remediation Waste

The concentration of PCBs in bulk materials sampled inside the mill building to date range from non-detect to 570 mg/kg. Fifteen of the thirty samples collected exhibited total PCB concentrations greater than 50 mg/kg. The source of PCBs at the site is likely a combination of spills and leaks of PCB-MODF from transformers and other electrical equipment, PCB-containing lubricating/hydraulic oils and PCB-contaminated fuel oil. Given uncertainty of the source, date of use and original concentration of PCBs in equipment in the mill building, sludge, dirt/debris and oily material on the floors and walls of the mill building will be presumed to be "PCB Remediation Wastes."

3.8 Quantity of PCB Remediation Waste

The quantity of PCB remediation waste has been estimated based on visual assessment of approximate material thickness and square footage of areas covered with sludge, dirt/debris and oily material. The table below summarizes the estimates.

Location	Estimated Impacted Area (sq. ft.)	Estimated Thickness (in)	Estimated Volume (cubic yards)
Maintenance Shop Area	4,200	0.5	6.5
Melt Building- ground	10,000	0.5	15
Melt Building – 1st	10,000	0.5	15
Storage & Manufacturing – ground	6,000	0.25	4.7
Storage & Manufacturing – 1st	6,000	0.25	4.7
Generator Room	400	0.25	0.3
Fuel piping in Melt Building and Storage/Manufacturing Area	Not Applicable	Not Applicable	10
		Estimated Total (cubic yards)	56.2

Specific PCB-contaminated locations are not delineated on the site plans due to the virtual ubiquitous presence of these materials within the mill building. As a result, sludge, dirt/debris and oily materials on floors, walls and in fuel piping will be presumed contaminated with PCBs (>1 ppm) and will be removed for proper disposal at a PCB disposal facility.

4.0 CLEANUP PLAN

4.1 Objective

The objective of the cleanup activities conducted under this Plan is to remove sludge, dirt/debris and oily material from the concrete flooring and walls of the former mill building, and to remove piping that contains heavy fuel oil contaminated with PCBs. Following removal of this material, additional characterization of underlying concrete and soils will be conducted, and self-implementation plans will be submitted to EPA for subsequent mitigation. The mill building is proposed to be demolished for site redevelopment.

4.2 Cleanup Goal

It is assumed that sludge, dirt/debris, oily material and associated fuel piping contain PCB concentrations greater than 1 mg/kg. Accordingly, this material will be collected and properly disposed as PCB Remediation Waste.

4.3 Public Notification

Ransom will notify the U.S. EPA, MEDEP, and the Windham Town Manager regarding the performance of the work prior to implementation of the Plan.

4.4 Necessary Permits

Ransom has submitted a Voluntary Response Action Plan to MEDEP and has received approval for site mitigation. Ransom has identified no other permit requirements

4.5 Sludge, dirt/debris and Oily Material Removal

Ransom will be on-site to oversee contractor removal of sludge, dirt/debris, oily material and associated piping from the mill building. Depending on the consistency of the material, PCB waste will be recovered using either a vacuum equipped with a HEPA-filter, or by shoveling into storage containers (*e.g.*, hardened sludge and oily materials). Dust suppression, such as application of a spay mist, will be implemented on an as-needed basis.

For oil-stained concrete surfaces, the contractor may apply a petroleum-based agent (*e.g.*, #2 fuel oil) to assist in removing residual PCB contamination. Applied liquids and residuals will be contained with plastic sheeting and absorbent pads.

Collected materials will be stored in labeled 55-gallon drums or roll-off containers. The containers will be kept closed except during transfer of waste to the containers. Used HEPA filters and containment materials (*i.e.*, plastic sheeting, tape, lumber) will be managed as PCB Remediation Waste. Following appropriate waste characterization activities, the PCB Remediation Waste is scheduled to be disposed at The Wayne Disposal in Belleville, Michigan.

4.6 Confirmatory Sampling and Cleanup Verification

Following the removal of the PCB-contaminated sludge, dirt/debris, oily materials and associated piping from the mill building, Ransom will conduct sampling of the underlying concrete to assess the

potential for residual PCBs. Samples will be collected in visibly stained areas and other locations where PCBs were identified during bulk sample characterization. Sampling will be conducted in accordance with EPA's "draft Standard Operating Procedure for Sampling Concrete in the Field." dated December 1, 1997. Sampling frequency will be assigned based on §761.265, "Sampling Bulk PCB Remediation Waste and Porous Surfaces." If PCBs are identified at concentrations greater than 1 mg/kg, a plan for mitigation of the concrete will be prepared and submitted to EPA.

4.7 Contingencies

The proposed PCB mitigation plan is inherently conservative in that sludge, dirt/debris and oily materials encountered within the mill building is assumed to be PCB Remediation Waste with total PCB concentrations >50 ppm . The greatest uncertainty is the volume of the material that will be collected, stored and disposed off site. Our client and the contractor are prepared to collect and properly dispose of additional PCB Remediation Waste if actual volumes exceed the estimates detailed herein.

5.0 PROPOSED IMPLEMENTATION SCHEDULE

Ransom proposes the following implementation schedule for the Plan.

Activity	Completion Date
Submittal of Plan	April 28, 2006
US. EPA Approval (expected)	May 28, 2006
Interior Building Material Removal	June-July 2006

TABLES

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	SS5	SS6	SS7	SS8	SS9	SS10	SS101A	SS101B	SS102	SS103	SS104
	Sample Type	Soil/Solids	Soil/Solids	Sludge/Solids	Sludge/Solids	Sludge/Solids	Sludge/Solids	Soil/Solids	Soil/Solids	Soil/Solids	Soil/Solids	Soil/Solids
	Location	Basement, Area of Broken Concrete	Basement, Floor Sump, Melt Building	1st floor, Maintenance Shop	1st floor, Maintenance Shop	1st floor, Maintenance Shop	1st floor, Melt Building	Basement, Floor Sump (split sample)	Basement, Floor Sump (split sample)	Basement, Dirt/Debris on Floor, Melt Building	Basement, Dirt/Debris on Floor, Melt Building	Basement, Dirt/Debris on Floor, Melt Building
	Result Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
PCBs	Collection Date	25-Nov-03	25-Nov-03	25-Nov-03	25-Nov-03	25-Nov-03	25-Nov-03	13-Jan-04	13-Jan-04	13-Jan-04	13-Jan-04	13-Jan-04
Aroclor-1016		< 39.2	< 48.2	< 33.1	< 54.6	3.2	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
Aroclor-1221		< 39.2	< 48.2	< 33.1	< 54.6	< 47.6	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
Aroclor-1232		< 39.2	< 48.2	< 33.1	< 54.6	< 47.6	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
Aroclor-1242		< 39.2	< 48.2	< 33.1	< 54.6	< 47.6	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
Aroclor-1248		< 39.2	< 48.2	< 33.1	< 54.6	< 47.6	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
Aroclor-1254		45	120	13	11	10	5.1	262	570	71.1	138	100
Aroclor-1260		32	54	< 33.1	< 54.6	3.5	< 43.9	<4.41	<31	<6.68	<29.8	<29.9
PCB Total		77	174	13	11	16.7	5.1	262	570	71.1	138	100

Notes:
NA = Not available
µg = microgram
mg/kg = milligram per kilogram
PCBs = Polychlorinated Biphenyls
J = Estimated value

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	IW-01	IW-02	IW-03	IWD-01	IWD-02	IS-01	IS-02	IS-03	IS-04	IS-05	IS-06
	Sample Type	Wipe	Wipe	Wipe	Wood	Wood	Sludge/ Solids	Sludge/ Solids	Oily Material	Oily Material	Sub-Slab Sample	Sludge/ Solids
	Location	2nd floor, Stockroom	2nd floor, Office Area	1st floor Hall Outside Maintenance Shop	1st floor, Melt Building	Basement, Generator Room	1st floor, Storage & Manufacturing	1st floor, Storage & Manufacturing	Basement, Melt Building Wall	Basement, Melt Building, Beneath Pipe Cutoff	Ground floor, Storage & Manufacturing	Ground floor, Storage & Manufacturing
	Result Units	µg	µg	µg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
PCBs	Collection Date	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	2-Nov-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05
Aroclor-1016		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1221		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1232		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1242		3 J	<5.0	<5.0	17	71	<4.5	<41	3.6	1.7	<3.9	<5.3
Aroclor-1248		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	35
Aroclor-1254		24	<5.0	<5.0	12	34	89	320	3.2	8.5	66	62
Aroclor-1260		17	<5.0	<5.0	7.9	<7.0	<4.5	<41	<1.0	<1.1	31	27
PCB Total		44	<5.0	<5.0	36.9	105	89	320	6.8	10.2	97	124

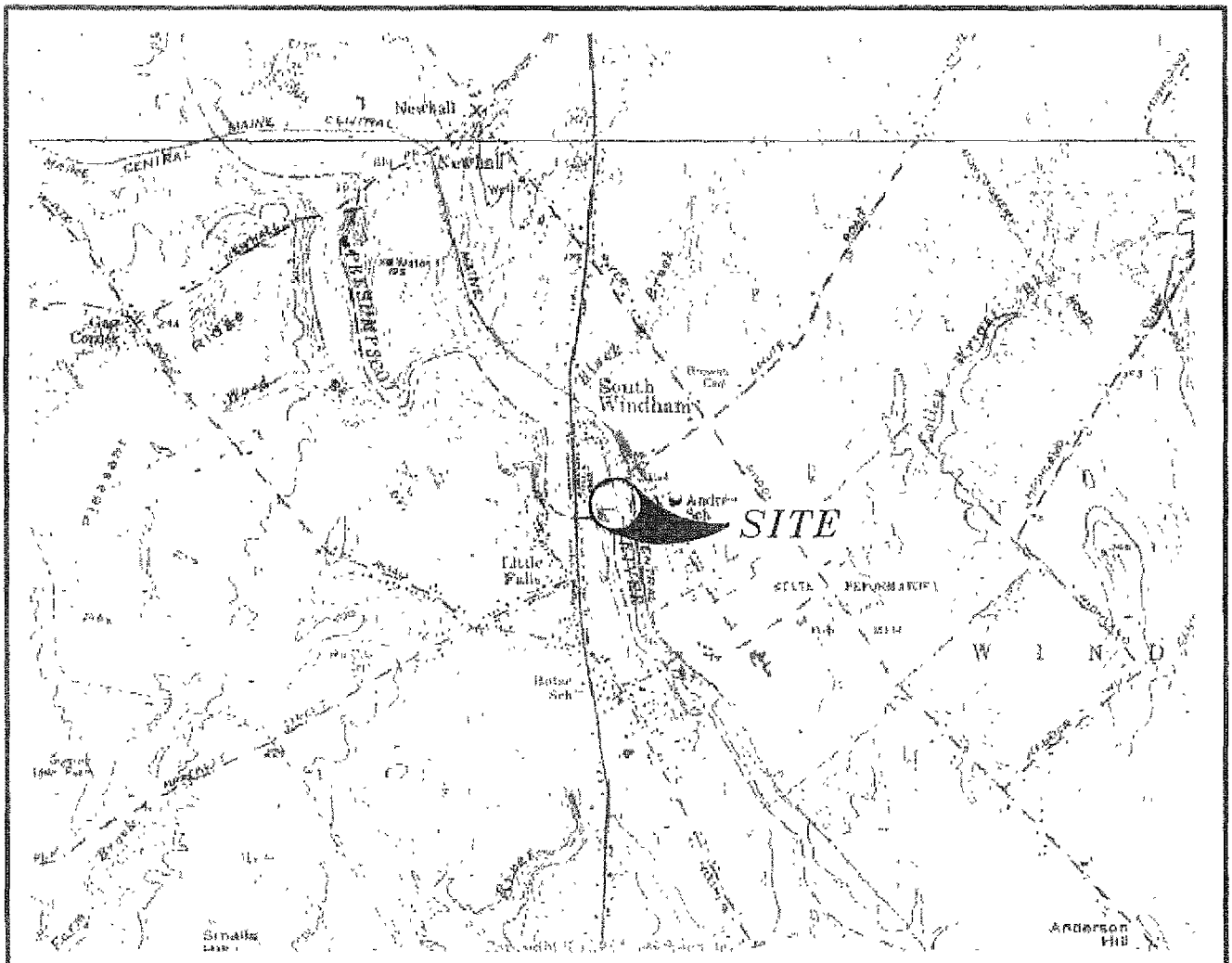
Notes
NA = Not available
µg = microgram
mg/kg = milligram per kilogram
PCBs = Polychlorinated Biphenyls
J = Estimated value

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	IS-07	IS-08	IS-09	IS-10	IS-11	IS-13	IS-14	IS-15	IS-16	IS-17	IS-18	Equip Blank
	Sample Type	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Oily Materials	Oily Materials	Oily Materials	Oily Materials	Aqueous
	Location	Ground floor, Press Building	Ground floor, Press Building Pit	Basement, adjacent to Main Stairs	1st floor, Melt Building	1st floor, Melt Building	Duplicate of IS-09	1st floor, Melt Building	Basement, Furnace Wall	1st Floor, Melt Building	1st Floor, Melt Building	Ground floor, Storage & Manufacturing	Rinsate Blank
	Result Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	µg/l
PCBs	Collection Date	27-Oct-05	27-Oct-05	2-Nov-05	27-Oct-05	2-Nov-05	2-Nov-05	2-Nov-05	2-Jan-06	2-Jan-06	2-Jan-06	2-Jan-06	27-Oct-05
Aroclor-1016		<1.0	<1.0	<1.0	<6.0	<3.4	<1.0	<5.2	<26	<6.3	<4.9	<5.0	<1.0
Aroclor-1221		<1.0	<1.0	<1.0	<6.0	<3.4	<1.0	<5.2	<26	<6.3	<4.9	<5.0	<1.0
Aroclor-1232		<1.0	<1.0	<1.0	<6.0	<3.4	<1.0	<5.2	<26	<6.3	<4.9	<5.0	<1.0
Aroclor-1242		<1.0	<1.0	<1.0	<6.0	<3.4	<1.0	<5.2	<26	<6.3	5.1	<5.0	<1.0
Aroclor-1248		<1.0	<1.0	2.2	<6.0	15	2	<5.2	240	110	<4.9	<5.0	<1.0
Aroclor-1254		1.8	<1.0	3.6	41	39	2.9	27	<26	<6.3	<4.9	<5.0	<1.0
Aroclor-1260		<1.0	<1.0	<1.0	<6.0	15	<1.0	<5.2	<26	<6.3	<4.9	<5.0	<1.0
PCB Total		1.8	<1.0	5.8	41	69	4.9	27	240	110	5.1	<5.0	<1.0

Notes:
NA = Not available
µg = microgram
mg/kg = milligram per kilogram
PCBs = Polychlorinated Biphenyls
J = Estimated value

FIGURES

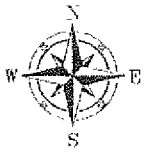


TAKEN FROM U.S.G.S. 7.5x15 MINUTE SERIES TOPOGRAPHIC MAP OF GORHAM, NAINE DATED 1975

CONTOUR INTERVAL IS 3 METERS

SITE COORDINATES: LATITUDE 43°44'06"
LONGITUDE 70°25'32"

UTM COORDINATES: 48: 43: 165mN
03: 85: 220mE



QUADRANGLE LOCATION

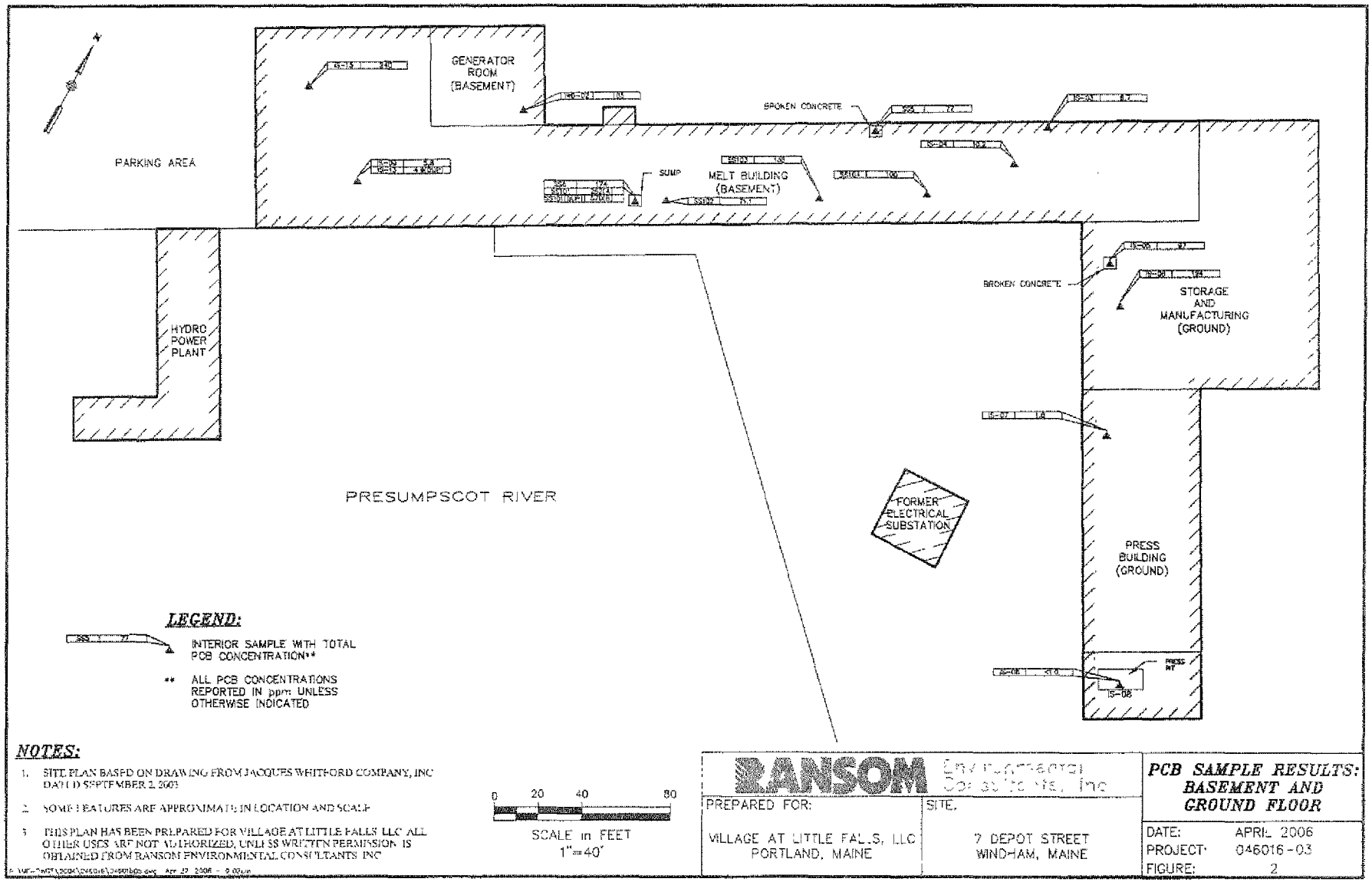
0 1000 2000 3000 4000

SCALE in FEET
1:25,000

RANSOM Environmental Consultants, Inc.

SITE LOCATION MAP

PREPARED FOR:	SITE:	DATE: APRIL 2006
VILLAGE AT LITTLE FALLS, LLC PORTLAND, MAINE	7 DEPOT STREET WINDHAM, MAINE	PROJECT: 046016 FIGURE: 1



HRC003080

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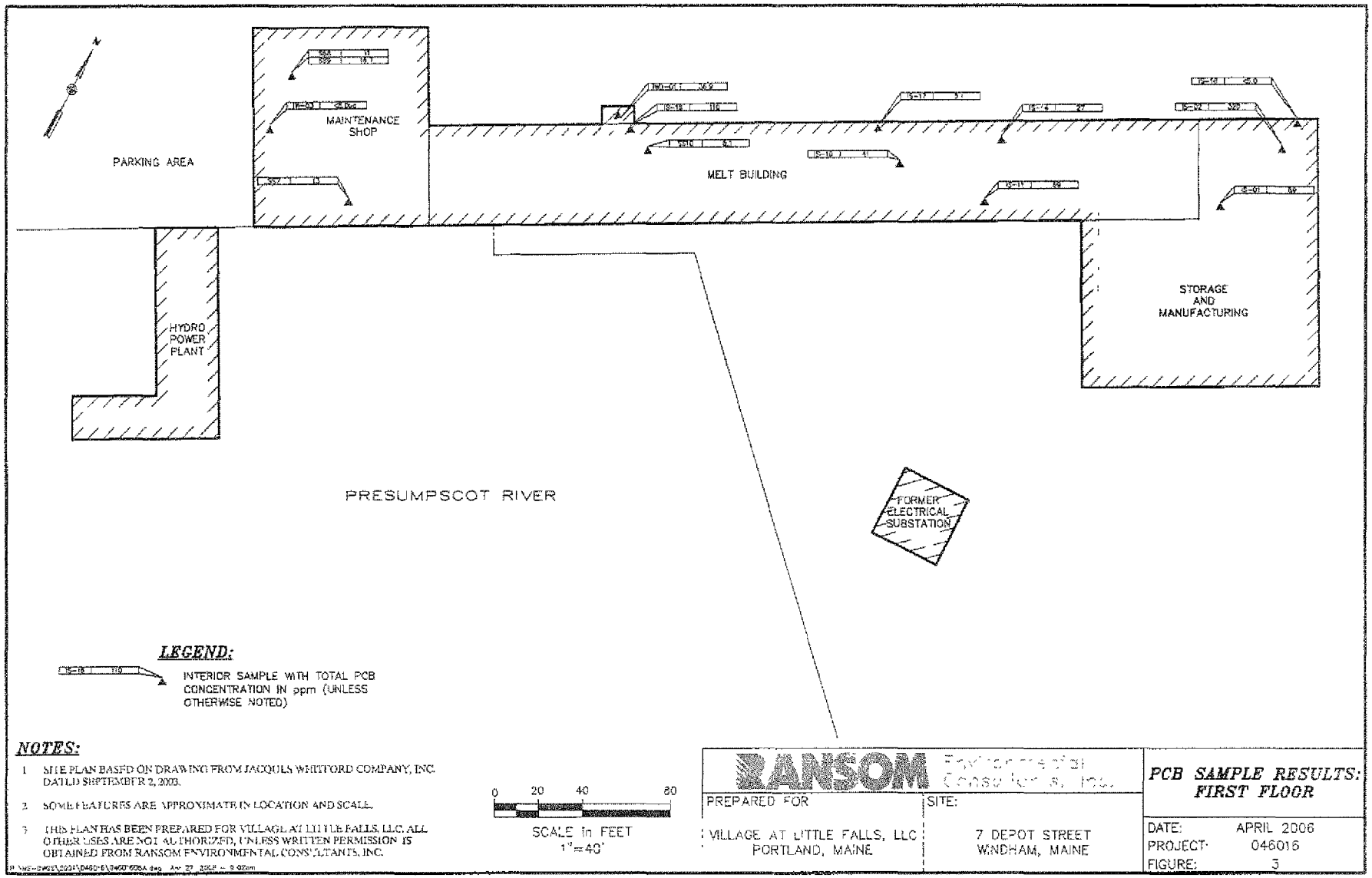
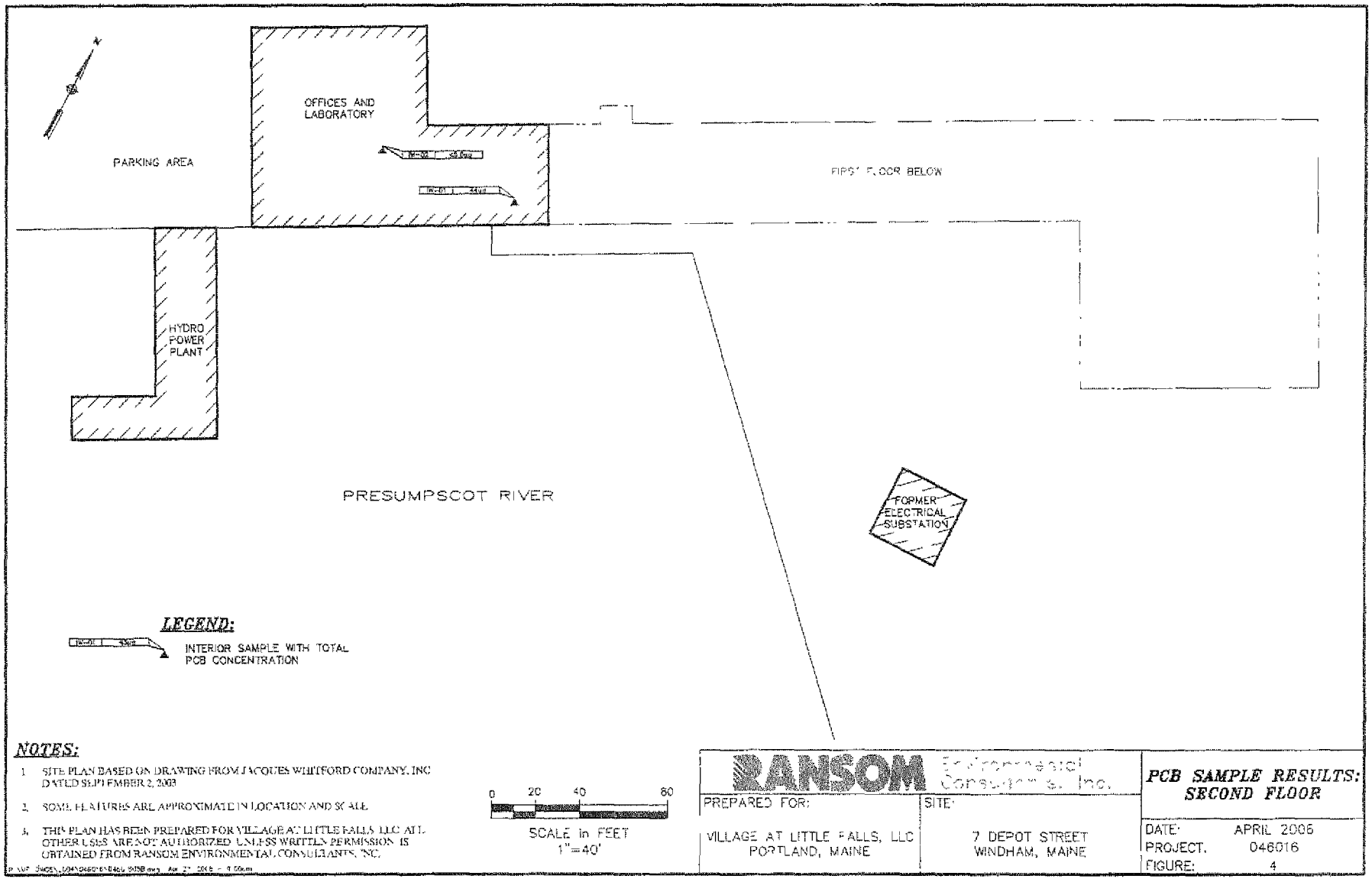


HRC003081

VIL_RESP01064



APPENDIX A

Certification

Certification

The undersigned, as owner of the property where the cleanup site is located and the party conducting the cleanup, hereby certifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file and available for EPA inspection at:

Ransom Environmental Consultants, Inc.
400 Commercial Street, Suite 404
Portland, Maine 04101

Signature

Title

Date

APPENDIX B

Laboratory Data Sheets

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export PA 15632
Phone 724 733 1161
Fax 724 327 7793

November 11, 2005

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Dear Ms. Haines:

Enclosed are analytical results for samples submitted to Pace Analytical by Ransom Environmental Consultants, Inc.. The samples were received on October 28, 2005. The results reported in this project meet the requirements as specified in Chapter 5 of the NELAC Standards Any deviations or discrepancies from the NELAC standards are documented in the case narrative(s) of this report. Please reference Pace project number 05-6238 when inquiring about this report

Client Site: Keddy Mill
Client Ref.: 046016

Pace Sample Identification	Client Sample Identification
0510-3449	IW-01
0510-3450	IW-02
0510-3451	IW-03
0510-3452	IWD-01
0510-3453	IS-01
0510-3454	IS-02
0510-3455	IS-03

Pace Sample Identification	Client Sample Identification
0510-3456	IS-04
0510-3457	IS-05
0510-3458	IS-06
0510-3459	IS-07
0510-3460	IS-08
0510-3461	IS-10
0510-3463	Equip. Blank

General Comments: Cooler temperature 1 ° C upon receipt Ice was present.

Please call me if you have any questions regarding the information contained within this report.

Sincerely,

Carin A. Ferris
Project Manager

CAM: jld

Enclosures

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref : 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3449
Client Sample ID. IW-01
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608[1]	24	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608[1]	17	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608[1]	43	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

[1] U.S. Environmental Protection Agency, 1982, Test Methods. Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Sample Comments: Results reported on an as received basis. 608 Aroclor Analysis: Sample 10-3449 contains Aroclor 1254 at 23.8 ug, Aroclor 1242 at 3.14 ug (which is below the 1.0 ug detection limit) and Aroclor 1260 at 16.5 ug. Together, the total Aroclor result is 43.44 ug.

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Ms. Lisa Haines
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400 Commercial Street
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Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3450
Client Sample ID: IW-02
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

[1] U.S. Environmental Protection Agency, 1982, Test Methods, Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio

Sample Comments: Results reported on an as received basis.

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3451
Client Sample ID: IW-03
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

[1] U.S. Environmental Protection Agency, 1982, Test Methods, Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Sample Comments: Results reported on an as received basis.

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3452
Client Sample ID: IWD-01
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	73	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	17	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	12	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	7.9	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	37	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3453
Client Sample ID: IS-01
Sample Matrix. Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	74	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	89	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	89	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0

[1] U.S Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out. The spike is diluted out of the MS and MSD performed on this sample. Recovery in the LCS is within limits.

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Ms. Lisa Haines
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400 Commercial Street
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Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3454
Client Sample ID: IS-02
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	81	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	320	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<41	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	320	41	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

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Ms. Lisa Haines
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400 Commercial Street
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Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3455
Client Sample ID: IS-03
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	97	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	3.6	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	3.2	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	6.7	1.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence.

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3456
Client Sample ID: IS-04
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	92	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.1	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<1.1	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<1.1	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	1.7	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<1.1	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	8.5	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<1.1	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	10	1.1	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

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Ms Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3457
Client Sample ID: IS-05
Sample Matrix: Solid

Date Sampled. 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	84	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<3.9	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<3.9	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<3.9	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<3.9	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<3.9	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	66	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	31	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	97	3.9	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

REPORT OF LABORATORY ANALYSIS

Pace Analytical®
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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site. Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3458
Client Sample ID: IS-06
Sample Matrix. Solid

Date Sampled: 10/27/2005
Date Received. 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	63	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<5.3	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<5.3	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<5.3	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<5.3	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	35	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	62	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	27	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	120	5.3	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

REPORT OF LABORATORY ANALYSIS

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400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3459
Client Sample ID: IS-07
Sample Matrix: Solid

Date Sampled 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	80	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	1.8	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor 1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	1.8	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0

[1] U S Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported in dry weight equivalence.

REPORT OF LABORATORY ANALYSIS

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Ms Lisa Haines
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400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3460
Client Sample ID: IS-08
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	59	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	<1.0	1.0	mg/kg	RDJ	11/08/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence.

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
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400 Commercial Street
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Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3461
Client Sample ID: IS-10
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	55	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	41	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<6.0	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	41	6.0	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

REPORT OF LABORATORY ANALYSIS

VIL_RESP01082

HRC003099

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Ms. Lisa Haines
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400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3463
Client Sample ID: Equip Blank
Sample Matrix: Aqueous

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1248	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1254	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0
PCB Total-TCL	8082[1]	<1.0	1.0	ug/l	RDJ	11/03/2005	0044212-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported on an as received basis.

REPORT OF LABORATORY ANALYSIS

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Pace Analytical

Page: of

926489

HRC003101

Section A Required Client Information:

Company:

Address:

Email To:

Phone: Fax:

Requested Due Date/TAT:

Section B Required Project Information:

Report To:

Copy To:

Purchase Order No:

Project Name:

Project Number:

Section C Invoice Information:

Attention:

Company Name:

Address:

Pace Quote Reference:

Pace Project Manager:

Pace Profile #:

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER

☐ UST ☐ RCRA ☐ Other

SITE LOCATION ☐GA ☐IL ☐IN ☐MI ☐MN ☐NC ☐OH ☐SC ☐WI ☐OTHER

Section D Required Client Information

SAMPLE ID

One Character per box. (A-Z, 0-9, -)

Sample IDs MUST BE UNIQUE

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

ITEM #	MATRIX CODE	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED: COMPOSITE START DATE	COLLECTED: COMPOSITE START TIME	COLLECTED: COMPOSITE END/GRAB DATE	COLLECTED: COMPOSITE END/GRAB TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Filtered (Y/N)	Requested Analysis	Residual Chlorine (Y/N)	Pace Project Number / Lab I.D.
1																				
2																				
3																				
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				

Additional Comments:

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITION
						N/A N/A N/A
						N/A N/A N/A
						N/A N/A N/A
						N/A N/A N/A

VIL-RESP01084

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE of SAMPLER:

DATE Signed (MM / DD / YY):

Temp in °C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

SEE REVERSE SIDE FOR INSTRUCTIONS

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Pace Analytical

Page: of

926438

HRC003102

Section A Required Client Information	Section B Required Project Information	Section C Invoice Information
Company:	Report To:	Attention:
Address:	Copy To:	Company Name:
		Address:
Email To:	Purchase Order No.:	Pace Quote Reference:
Phone: Fax:	Project Name:	Pace Project Manager:
Requested Due Date/TAT:	Project Number:	Pace Profile #:

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ Other

SITE LOCATION ☐ GA ☐ IL ☐ IN ☐ MI ☐ MN ☐ NC ☐ OH ☐ SC ☐ WI ☐ OTHER

Section D Required Client Information

SAMPLE ID

One Character per box.
(A-Z, 0-9 / ,-)
Sample IDs MUST BE UNIQUE

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

ITEM #	MATRIX CODE	SAMPLE TYPE G=GRAB C=COMP	COLLECTED: COMPOSITE START DATE	COLLECTED: COMPOSITE START TIME	COLLECTED: COMPOSITE END/GRAB DATE	COLLECTED: COMPOSITE END/GRAB TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Filtered (Y/N)	Requested Analysis	Residual Chlorine (Y/N)	Pace Project Number / Lab ID
1																				
2																				
3																				
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				

Additional Comments:

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITION
						Y/N Y/N Y/N
						Y/N Y/N Y/N
						Y/N Y/N Y/N
						Y/N Y/N Y/N

Temp in °C | Received on Ice | Custody Sealed Cooler | Samples Intact

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE OF SAMPLER: DATE Signed (MM/DD/YY):

VIL-REQP01085

SEE REVERSE SIDE FOR INSTRUCTIONS

2E

WATER AROCLOR SURROGATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

GC Column(1): RTX-5 ID: 0.53 (mm)

	EPA SAMPLE NO.	TCX %REC #	DCB %REC #	S3 %REC #	S4 %REC #	S5 %REC #	S6 %REC #	TOT OUT
01	EQUIP. BLANK	66	41					0
02	LCS	63	79					0
03	LCSD	70	84					0
04	PBLKH	60	80					0
05								
06								
07								
08								
09								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

ADVISORY QC LIMITS

S1 (TCX) = Tetrachloro-m-xylene (30-150)
S2 (DCB) = Decachlorobiphenyl (30-150)

Column to be used to flag recovery values
* Values outside of QC limits
D Surrogate diluted out

FORM 3
WATER AROCLOR LAB CONTROL SAMPLE

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

Matrix Spike - Sample No.: LCS

COMPOUND	SPIKE ADDED (ug/L)	SAMPLE CONCENTRATION (ug/L)	LCS CONCENTRATION (ug/L)	LCS % REC #	QC. LIMITS REC.
Aroclor-1248	2.50		1.80	72	55-145

COMPOUND	SPIKE ADDED (ug/L)	LCSD CONCENTRATION (ug/L)	LCSD % REC #	% RPD #	QC LIMITS RPD	QC LIMITS REC.
Aroclor-1248	2.50	1.96	78	8	25	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 1 outside limits
Spike Recovery: 0 out of 2 outside limits

COMMENTS: QC is Batch QC from Project 05-6224.

2F

SOIL AROCLOR SURROGATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

GC Column(1): RTX-5 ID: 0.53 (mm) GC Column(2): RTX-1701 ID: 0.53 (mm)

	EPA SAMPLE NO.	TCX 1 %REC #	TCX 2 %REC #	DCB 1 %REC #	DCB 2 %REC #	OTHER (1)	OTHER (2)	TOT OUT
01	IS-07	87	86	127	121			0
02	IS-08	69	69	101	90			0
03	IS-01	0D	0D	0D	0D			0
04	IS-01MS	0D	0D	0D	0D			0
05	IS-01MSD	0D	0D	0D	0D			0
06	LCS1	68	66	138	116			0
07	PBLKS	46	48	88	94			0
08	IS-03	91	112	102	113			0
09	IS-04	51	60	120	76			0
10	IWD-01	0D	0D	0D	0D			0
11	IS-02	0D	0D	0D	0D			0
12	IS-05	0D	0D	0D	0D			0
13	IS-06	0D	0D	0D	0D			0
14	IS-10	0D	0D	0D	0D			0
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

ADVISORY QC LIMITS

S1 (TCX) = Tetrachloro-m-xylene (30-150)
S2 (DCB) = Decachlorobiphenyl (30-150)

Column to be used to flag recovery values
* Values outside of QC limits
D Surrogate diluted out

FORM 3
SOIL AROCLOR LAB CONTROL SAMPLE

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

Matrix Spike - Sample No.: LCS1

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/Kg)	LCS CONCENTRATION (ug/g)	LCS % REC #	QC. LIMITS REC.
Aroclor-1248	1.67		1.20	72	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 0 outside limits
Spike Recovery: 0 out of 1 outside limits

COMMENTS: _____

3F

SOIL AROCLOR MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

Matrix Spike - EPA Sample No.: IS-01

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/g)	MS CONCENTRATION (ug/g)	MS % REC #	QC. LIMITS REC.
Aroclor-1248	1.66	0.000	0.000	0*	55-145

COMPOUND	SPIKE ADDED (ug/g)	MSD CONCENTRATION (ug/g)	MSD % REC #	% RPD #	QC LIMITS RPD	QC LIMITS REC.
Aroclor-1248	1.65	0.000	0*		25	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 1 outside limits
Spike Recovery: 2 out of 2 outside limits

COMMENTS: Spike is diluted out of the MS and MSD. LCS recovery is within limits.

2F

WIPE AROCLOR SURROGATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

GC Column(1): RTX-5 ID: 0.53 (mm) GC Column(2): RTX-1701 ID: 0.53 (mm)

	EPA SAMPLE NO.	TCX 1 %REC #	TCX 2 %REC #	DCB 1 %REC #	DCB 2 %REC #	OTHER (1)	OTHER (2)	TOT OUT
01	IW-01	82	82	102	106			0
02	IW-02	84	85	107	110			0
03	IW-03	86	86	111	113			0
04	LCS	96	96	136	138			0
05	LCSD	99	99	140	144			0
06	PBLK	92	91	129	133			0
07								
08								
09								
10								
11								
12								
13								
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16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

ADVISORY QC LIMITS

S1 (TCX) = Tetrachloro-m-xylene (30-150)
S2 (DCB) = Decachlorobiphenyl (30-150)

Column to be used to flag recovery values
* Values outside of QC limits
D Surrogate diluted out

FORM 3
WIPE AROCLOR LAB CONTROL SAMPLE

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6238 SAS No.: SDG No.: 05-6238

Matrix Spike - Sample No.: LCS

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/Kg)	LCS CONCENTRATION (ug/g)	LCS % REC #	QC. LIMITS REC.
Aroclor-1016	12.5		12.1	97	55-145
Aroclor-1260	12.5		13.5	108	55-145

COMPOUND	SPIKE ADDED (ug/g)	LCSD CONCENTRATION (ug/g)	LCSD % REC #	% RPD #	QC LIMITS RPD	QC LIMITS REC.
Aroclor-1016	12.5	12.5	100	3	25	55-145
Aroclor-1260	12.5	13.9	111	3	25	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 2 outside limits
Spike Recovery: 0 out of 4 outside limits

COMMENTS: QC is Batch QC from Project 05-6132.

FORM III GCMULT

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November 11, 2005

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Dear Ms. Haines:

Enclosed are analytical results for samples submitted to Pace Analytical by Ransom Environmental Consultants, Inc. The samples were received on November 3, 2005 The results reported in this project meet the requirements as specified in Chapter 5 of the NELAC Standards. Any deviations or discrepancies from the NELAC standards are documented in the case narrative(s) of this report. Please reference Pace project number 05-6344 when inquiring about this report.

Client Site: Keddy Mill
Client Ref: 046016

Pace Sample Identification	Client Sample Identification
0511-0761	IS-09
0511-0762	IS-11
0511-0763	IS-14
0511-0764	IS-13
0511-0765	IWD-02

General Comments: Cooler temperature 7 ° C upon receipt. Ice was present. Limited sample was received for 0765 Extracted 15g for the PCB analysis.

Please call me if you have any questions regarding the information contained within this report.

Sincerely,

Carin A. Ferris
Project Manager

CAM: jld

Enclosures

HRC003111

Pace Analytical

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Page: of

926585

Section A Required Client Information:

Company:	
Address:	
Email To:	
Phone:	Fax:
Requested Due Date/TAT:	

Section B Required Project Information

Report To:	
Copy To:	
Purchase Order No:	
Project Name:	
Project Number:	

Section C Invoice Information:

Attention:	
Company Name:	
Address:	
Pace Quote Reference:	
Pace Project Manager:	
Pace Profile #:	

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ Other_____

SITE LOCATION ☐GA ☐IL ☐IN ☐MI ☐MN ☐NC ☐OH ☐SC ☐WI ☐ OTHER_____

Section D Required Client Information

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL SOLID	SL
OIL	O
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

ITEM #	SAMPLE ID (One Character per box. (A-Z, 0-9 / ,-) Samples IDs MUST BE UNIQUE)	MATRIX CODE	SAMPLE TYPE G=GRAB C=COMP	COLLECTED: COMPOSITE START DATE	COMPOSITE START TIME	COMPOSITE END/GRAB DATE	COMPOSITE END/GRAB TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Filtered (Y/N)	Requested Analysis:	Residual Chlorine (Y/N)	Pace Project Number / Lab I.D.
1																					
2																					
3																					
4																					
5																					
6																					
7																					
8																					
9																					
10																					
11																					
12																					

Additional Comments

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITION

VIL-RESP01094

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER:

SIGNATURE of SAMPLER: DATE Signed (MM/DD/YY):

Temp in °C | Received on Ice (Y/N) | Custody Sealed Cooler (Y/N) | Samples Intact (Y/N)

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Fax' 724 327 7793

Ms. Lisa Haines
Ransom Environmental Consultants. Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6344
Lab Sample ID: 0511-0761
Client Sample ID: IS-09
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	68	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1 0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<1 0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<1.0	1 0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	2.2	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	3.6	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	5.8	1 0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed.. Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported in dry weight equivalence.

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6344
Lab Sample ID: 0511-0762
Client Sample ID: IS-11
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	97	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	15	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	39	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	15	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	69	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U S Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0762.

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6344
Lab Sample ID: 0511-0763
Client Sample ID: IS-14
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	64	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	27	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	27	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0763.

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6344
Lab Sample ID: 0511-0764
Client Sample ID: IS-13
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	67	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	2.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	2.9	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	4.9	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence.

REPORT OF LABORATORY ANALYSIS

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Ms. Lisa Haines
Ransom Environmental Consultants, Inc
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6344
Lab Sample ID: 0511-0765
Client Sample ID: IWD-02
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	93	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	71	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	34	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	100	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0765.

REPORT OF LABORATORY ANALYSIS

2F
SOIL AROCLOR SURROGATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6344 SAS No.: SDG No.: 05-6344

GC Column(1): RTX-5 ID: 0.53 (mm) GC Column(2): RTX-1701 ID: 0.53 (mm)

	EPA SAMPLE NO.	TCX 1 %REC #	TCX 2 %REC #	DCB 1 %REC #	DCB 2 %REC #	OTHER (1)	OTHER (2)	TOT OUT
01	IS-09	75	64	76	72			0
02	IS-13	76	62	74	55			0
03	LCS2	95	82	105	90			0
04	PBLK2	78	79	79	80			0
05	IS-11	104D	97D	264D	875D			0
06	IS-14	93D	79D	178D	106D			0
07	IWD-02	103D	77D	204D	110D			0
08								
09								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

ADVISORY
QC LIMITS

S1 (TCX) = Tetrachloro-m-xylene (30-150)
S2 (DCB) = Decachlorobiphenyl (30-150)

Column to be used to flag recovery values
* Values outside of QC limits
D Surrogate diluted out

FORM 3F
SOIL AROCLOR LAB CONTROL SAMPLE

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6344 SAS No.: SDG No.: 05-6344

Matrix Spike - Sample No.: LCS2

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/Kg)	LCS CONCENTRATION (ug/g)	LCS % REC #	QC. LIMITS REC.
Aroclor-1248	1.67		1.43	86	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 0 outside limits
Spike Recovery: 0 out of 1 outside limits

COMMENTS: QC is Batch QC from Project 05-6256.

3F

SOIL AROCLOR MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 05-6344 SAS No.: SDG No.: 05-6344

Matrix Spike - EPA Sample No.: WSI10.511024

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/g)	MS CONCENTRATION (ug/g)	MS % REC #	QC. LIMITS REC.
Aroclor-1248	1.66	0.000	1.48	89	55-145

COMPOUND	SPIKE ADDED (ug/g)	MSD CONCENTRATION (ug/g)	MSD % REC #	% RPD #	QC LIMITS RPD	QC LIMITS REC.
Aroclor-1248	1.64	1.44	88	1	25	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 1 outside limits
Spike Recovery: 0 out of 2 outside limits

COMMENTS: QC is Batch QC from Project 05-6256.

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5203 Triangle Lane
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Phone: 724 733.1161
Fax: 724 327.7793

January 19, 2006

Mr. Todd Coffin
Ransom Environmental Consultants Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Dear Mr. Coffin:

Enclosed are analytical results for samples submitted to Pace Analytical by Ransom Environmental Consultants, Inc.. The samples were received on January 5, 2006. The results reported in this project meet the requirements as specified in Chapter 5 of the NELAC Standards. Any deviations or discrepancies from the NELAC standards are documented in the case narrative(s) of this report. Please reference Pace project number 06-0219 when inquiring about this report.

Client Site: Keddy Mill
Client Ref.: 046016

Pace Sample Identification	Client Sample Identification
0601-0625	IS-18
0601-0626	IS-17
0601-0627	IS-16
0601-0628	IS-15

General Comments: Cooler temperature 8 ° C upon receipt. Ice was present.

Please call me if you have any questions regarding the information contained within this report.

Sincerely,

Carin A. Ferris
Project Manager

CAM: jld

Enclosures

Page 1 of ____

REPORT OF LABORATORY ANALYSIS

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Mr Todd Coffin
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.. 046016

Lab Project ID: 06-0219
Lab Sample ID: 0601-0625
Client Sample ID: IS-18
Sample Matrix. Organic Waste

Date Sampled: 01/02/2006
Date Received: 01/05/2006

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082(1)	<5 0	5 0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1221	8082(1)	<5 0	5.0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1232	8082(1)	<5 0	5.0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1242	8082(1)	<5.0	5.0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1248	8082(1)	<5.0	5.0	mg/kg	RDJ	01/16/2006	0046204-1	<1 0
Aroclor-1254	8082(1)	<5.0	5 0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1260	8082(1)	<5 0	5 0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
PCB Total-TCL	8082(1)	<5 0	5.0	mg/kg	RDJ	01/16/2006	0046204-1	<1.0

(1) U.S. Environmental Protection Agency, 1996. Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported on an as received basis.

REPORT OF LABORATORY ANALYSIS

VIL_RESP01104

HRC003121

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Mr. Todd Coffin
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site. Keddy Mill
Client Ref.: 046016

Lab Project ID	**06-0219**
Lab Sample ID:	**0601-0626**
Client Sample ID	IS-17
Sample Matrix:	Organic Waste
Date Sampled:	01/02/2006
Date Received:	01/05/2006

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor 1016	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1221	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1232	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1242	8082[1]	5.1	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1248	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1254	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1260	8082[1]	<4.9	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
PCB Total-TCL	8082[1]	5.1	4.9	mg/kg	RDJ	01/16/2006	0046204-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported on an as received basis.

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Mr Todd Coffin
Ransom Environmental Consultants, Inc
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 06-0219
Lab Sample ID: 0601-0627
Client Sample ID. IS-16
Sample Matrix: Organic Waste

Date Sampled: 01/02/2006
Date Received: 01/05/2006

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1221	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1232	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1242	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1248	8082[1]	110	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1254	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1260	8082[1]	<6.3	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
PCB Total-TCL	8082[1]	110	6.3	mg/kg	RDJ	01/16/2006	0046204-1	<1.0

[1] U.S Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported on an as received basis. Limited sample was provided for analysis. A volume of 0.4 gram was extracted instead of the method required 1 gram There was a small amount of sediment from the samples that did not go into solution during the extraction process. The samples were placed in a sonic bath for 12 minutes to ensure good extraction.

REPORT OF LABORATORY ANALYSIS

VIL_RESP01106

HRC003123

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Mr. Todd Colfin
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 06-0219
Lab Sample ID: 0601-0628
Client Sample ID: IS-15
Sample Matrix: Organic Waste

Date Sampled: 01/02/2006
Date Received: 01/05/2006

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1221	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1232	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1242	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1248	8082[1]	240	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1254	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
Aroclor-1260	8082[1]	<26	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0
PCB Total-TCL	8082[1]	240	26	mg/kg	RDJ	01/16/2006	0046204-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed. Office of Solid Waste and Emergency Response, Washington, DC

Sample Comments: Results reported on an as received basis. The surrogates were diluted out.

REPORT OF LABORATORY ANALYSIS

2F

WASTE AROCLOR SURROGATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract.

Lab Code: Case No.: 06-0219 SAS No.: SDG No.: 06-0219

GC Column(1): RTX-1701 ID: 0.53 (mm) GC Column(2): RTX-5 ID: 0.53 (mm)

	EPA SAMPLE NO.	TCX 1 %REC #	TCX 2 %REC #	DCB 1 %REC #	DCB 2 %REC #	OTHER (1)	OTHER (2)	TOT OUT
01	IS-18	78	69	88	83			0
02	IS-17	87	86	98	92			0
03	IS-16	85	84	86	80			0
04	LCS	97	97	95	88			0
05	PBLK	106	105	102	95			0
06	IS-15	88	95	96	98			0
07								
08								
09								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

ADVISORY QC LIMITS

S1 (TCX) = Tetrachloro-m-xylene (30-150)

S2 (DCB) = Decachlorobiphenyl (30-150)

Column to be used to flag recovery values

* Values outside of QC limits

D Surrogate diluted out

FORM 3
WASTE AROCLOR LAB CONTROL SAMPLE

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 06-0219 SAS No.: SDG No.: 06-0219

Matrix Spike - Sample No.: LCS

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/Kg)	LCS CONCENTRATION (ug/g)	LCS % REC #	QC. LIMITS REC.
Aroclor-1248	5.00		3.89	78	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 0 outside limits
Spike Recovery: 0 out of 1 outside limits

COMMENTS: QC is Batch QC from Project 06-0180.

3F

WASTE AROCLOR MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERY

Lab Name: PACE ANALYTICAL SERVICES, Contract:

Lab Code: Case No.: 06-0219 SAS No.: SDG No.: 06-0219

Matrix Spike - EPA Sample No.: SAMPLE

COMPOUND	SPIKE ADDED (ug/g)	SAMPLE CONCENTRATION (ug/g)	MS CONCENTRATION (ug/g)	MS % REC #	QC. LIMITS REC.
Aroclor-1248	4.85	0.000	3.98	82	55-145

COMPOUND	SPIKE ADDED (ug/g)	MSD CONCENTRATION (ug/g)	MSD % REC #	% RPD #	QC LIMITS RPD	QC LIMITS REC.
Aroclor-1248	4.76	3.45	73	12	25	55-145

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 1 outside limits
Spike Recovery: 0 out of 2 outside limits

COMMENTS: QC is Batch QC from Project 06-0180.

Pace Analytical

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Page: of

Section A Required Client Information:	Section B Required Project Information	Section C Invoice Information
Company	Report To	Attention
Address	Copy To	Company Name
		Address
Email To	Purchase Order No	Pace Quote Reference
Phone / Fax	Project Name.	Pace Project Manager
Requested Due Date/TAT.	Project Number.	Pace Profile #

REGULATORY AGENCY

☐ NPDES ☐ GROUND WATER ☐ DRINKING WATER
☐ UST ☐ RCRA ☐ Other

SITE LOCATION ☐ GA ☐ FL ☐ IN ☐ MI ☐ MN ☐ NC ☐ OH ☐ SC ☐ WI ☐ OTHER

Section D Required Client Information

SAMPLE ID

One Character per box
(A-Z, 0-9 / ,-)
Samples IDs MUST BE UNIQUE

Valid Matrix Codes

MATRIX	CODE
DRINKING WATER	DW
WATER	WT
WASTE WATER	WW
PRODUCT	P
SOIL/SOLID	SL
OIL	OL
WIPE	WP
AIR	AR
OTHER	OT
TISSUE	TS

ITEM #	MATRIX CODE	SAMPLE TYPE (G=GRAB C=COMP)	COLLECTED: COMPOSITE START DATE	COMPOSITE START TIME	COMPOSITE END/GRAB DATE	COMPOSITE END/GRAB TIME	SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives: Unpreserved	H_2SO_4	HNO_3	HCl	NaOH	$Na_2S_2O_3$	Methanol	Other	Filtered (Y/N)	Residual Chlorine (Y/N)	Pace Project Number / Lab I.D.
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			

Requested Analysis

Additional Comments:

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITION

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER

SIGNATURE of SAMPLER

DATE Signed (MM / DD / YY)

VIL_RESP01111

SEE REVERSE SIDE FOR INSTRUCTIONS

HRC003128

APPENDIX C

Notification to MDEP and Town of Windham

RANSOM

April 28, 2006

Mr. Nick Hodgkins
Voluntary Response Action Program
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Re Notification for Self-Implementation of PCB Remediation Waste

Dear Mr Hodgkins:

In accordance with 40 CFR 761 61(a)(3), the US Environmental Protection Agency (EPA) requires notification to state environmental agencies of proposed PCB remediation activities As you are aware, Ransom Environmental Consultants, Inc. is assisting with environmental mitigation at the former Keddy Mill in South Windham, Maine. Ransom has identified PCB wastes at this site that will require clean-up under EPA and State of Maine requirements.

We have attached hereto our notification of proposed PCB mitigation activity at the Keddy Mill site Ransom would be pleased to meet with you to discuss proposed the proposed clean-up work at this site. In the meantime, if you have any questions or require additional information, please contact the undersigned at (207) 939-4150 or (207) 772-2891.

Sincerely,

Ransom Environmental Consultants, Inc.

D Todd Coffin, C.G.
Project Manager

400 Commercial Street, Suite 404, Portland, Maine 04101, Tel (207) 772-2891, Fax (207) 772 3248
www.ransomenv.com

VIL_RESP01113
HRC003130

RANSOM

April 28, 2006

Mr. Tony Plante, Town Manager
Windham Municipal Offices
8 School Road
Windham, Maine 04062

Re: Notification for Self-Implementation of PCB Remediation Waste

Dear Mr. Plante:

In accordance with 40 CFR 761 61(a)(3), the US Environmental Protection Agency (EPA) requires notification to local environmental agencies of proposed PCB remediation activities. Ransom Environmental Consultants, Inc. is assisting with environmental mitigation at the former Keddy Mill in South Windham, Maine. Ransom has identified PCB wastes at this site that will require clean-up under EPA and State of Maine requirements.

We have attached hereto our notification of proposed PCB mitigation activity at the Keddy Mill site. Ransom would be pleased to meet with you to discuss proposed the proposed clean-up work at this site. In the meantime, if you have any questions or require additional information, please contact the undersigned at (207) 939-4150 or (207) 772-2891.

Sincerely,

Ransom Environmental Consultants, Inc.

D Todd Coffin, C.G.
Project Manager

400 Commercial Street, Suite 404, Portland, Maine 04101, Tel (207) 772 2891, Fax (207) 772 3248
[illegible] Portsmouth, New Hampshire [illegible]
[illegible] Wharf, Newburyport, Massachusetts 01950 [illegible]
[illegible] Hamilton, New Jersey [illegible]
[illegible] East Providence, Rhode Island [illegible]
www.ransomenv.com

VIL_RESP01114
HRC003131

RCDB
"Healthy Rivers Equal Healthy Communities"

State of Maine
2008 Riverfront Community Development Bond Program

Letter of Intent to Apply

(Due at DECD on or before September 26, 2008 at 4:00 p.m.)
(Instructions and Guideform are contained on page 6.)

All communities wishing to apply for a 2008 Riverfront Community Development Bond Program (RCDB) grant must use this Letter of Intent to document compliance with requirements established under 5 MRSA §13083-T and the Final Rule adopted by the Department of Economic and Community Development. Applicants who submit a completed Letter of Intent and comply with applicable RCDB requirements will be notified in writing by OCD that they are eligible to submit a final application. Eligibility to submit a final application does not imply final project approval or funding.

A. ELIGIBILITY

1. Eligible Applicant:

Applicant:	**Town of Windham**	Phone:	**(207) 892-1907**
Address:	**8 School Road**	Fax:	**(207) 892-1910**
City, ZIP:	**Windham, Maine 04062**	E-Mail:	**atplante@town.windham.me.us**
Chief Official:	**Anthony Plante, Town Manager**		

2. Applying on Behalf or Partnering with Sub-Grantee: (e.g.: Non-Profit, Developer, etc.)

Sub-Grantee:	**HRC-Village at Little Falls LLC**	Phone:	**207-772-7219**
Address:	**2 Market St 6th flr**	Fax:	**207-772-7011**
City, ZIP:	**Portland, ME 04101**	E-Mail:	**setzel@hudsoncap.com**
Agency Rep:	**Stephen A. Etzel**	Title	**Vice Pres. - Hudson Realty Capital**

3. Engineer/Architect consulted for project & providing cost estimates (if applicable):

Name:	**Lee Allen**	Phone:	**207-883-1000**
Firm:	**Northeast Civil Solutions Inc**	Fax:	**207-883-1001**
Address:	**153 US Route 1**	E-Mail:	**Lee.allen@northeastcivilsolutions.com**
City, ZIP:	**Scarborough ME 04074**		

4. Recognized Maine River as defined in Section 1 (8) of the Final Rule. All RCDB activities must take place on or adjacent to a Recognized Maine River.

Insert name of Maine River in box to the right.	**Presumpscot River**

B. ELIGIBLE USES (Please see Page 6 for a complete list of Ineligible Uses.)

Place an "X" to the left of the RCDB activity which your application seeks to undertake. For projects undertaking multiple uses please place an "X" to the left of each activity that applys.

X	1. Rehabilitation of run down or abandoned buildings and related sites, such as former mills, warehouses and other commercial or industrial facilities.
X	2. Restoration and improvement of habitat for fish and wildlife.
	3. Development of public access points for boating and fishing.
	4. Creation of riverfront parks, walking trails and other recreational amenities.
	5. Development of facilities in support of the arts, local agriculture and crafts relating to furthering the Creative Economy along Maine's Rivers.

VIL_RESP01115

HRC009336

C. ELIGIBLE PROJECT SITES

To be eligible to receive assistance from the RCDB ownership of all Project Sites must be clearly established in one of the following categories at the time of submission of the Letter of Intent. Place an "X" to the left of the applicable project site where the RCDB activity which your application seeks to undertake will take place. **(Attach documentation of ownership or lease to your submission)**

	1. Municipally Owned.
	2. Owned by a recognized not-for-profit organization such as a 501(C)(3) and designated for a public use.
	3. Secured by a minimum 75 year lease for a public use, unless otherwise expressly covered under an existing state statute.
X	4. In the case of assistance to run-down or abandoned buildings such as former mills, warehouses or other commercial or industrial facilities, the property may be privately owned if it is located in a defined downtown area or another area on a Maine River that is part of a growth area designated in a Comprehensive Plan adopted by the municipality and approved by the State Planning Office under the Growth Management Act, and so long as a public benefit such as provision of municipal recreational opportunities, affordable housing, public open space or access or is realized as a long-term benefit of the project.

D. DEMONSTRATED CAPACITY OF APPLICANT AND RCDB PARTNERS

Using the space below please describe applicant's and all partner's level of debt; fund-raising ability; past economic and community development activities; grants from federal, state or local sources; previous environmental conservation, restoration or enhancement activity; organizational history; scope of economic or environmental vision; and evidence of success in previous efforts.

The Town of Windham, Maine, population 15,984 (2007 est.), municipal workforce of 196 full and part-time employees, including Town administration, planning, and economic development offices, is positioned to effectively manage grant funding. Windham's municipal valuation is $1,829,201,100 (April 1, 2008) tax rate of $11.40/$1000, and total debt of $32,918,796 (June 30, 2008). Recent grant awards include the Cumberland County CDBG Program as well as US EPA funding for wastewater infrastructure improvements at its Little Falls Wastewater Conveyance Project. The Town demonstrates its environmental stewardship through zoning, including Aquifer and Shoreland Protection, its ordinances including the Surface Water Protection Ordinance and by providing Watershed Protection Fund Grants to organizations for protection or restoration of water bodies within Town. The Towns of Windham and Gorham, along with a CDBG Planning Grant, jointly funded the development of "A Plan for the Revitalization of South Windham/Little Falls Village" a resident driven vision for community and economic development in the village. This comprehensive vision calls for the redevelopment of the current mill site as a keystone to village revitalization. The renovation or removal of this blighted building and removal of its associated environmental contaminants will be major steps in realizing this vision.

HRC-Village at Little Falls LLC is an ownership entity of Fund III owned and managed by Hudson Realty Capital of New York City and Portland Maine. Hudson Realty Capital LLC ("HRC") is a real estate private equity fund founded in 2003. HRC provides both debt and equity financing alternatives across a wide range of asset classes. Since its formation, HRC has closed approximately $2 billion worth of debt and equity transactions in more than 150 separate transactions. HRC manages dozens of residential and commercial land development investments in the United States and Mexico.

E. PROJECT INFORMATION

Provide a clear, concise description of the proposed project using the space below. The scope of work should be very specific in identifying how RCDB funds will be used and how the project relates to a Maine River. A projected project timeline should be included.

The Village at Little Falls, located in South Windham, is the re-use of an underutilized village parcel, currently the site of a vacant mill structure, with attractive views and frontage on the Presumpscot River. On September 10, 2007, Hudson received final site plan and subdivision plan approval for an 82 unit residential condominium project on 8.5 acres of land from the Town of Windham, Maine.

The business plan envisions the development of the condominium units in cottage, townhouse, porch, and a mid-rise multifamily building, as well as one detached single family unit. The development was designed to allow views and walking access to the river, promote revitalization of the village area. It has benefited from both community and political support.

The vacant mill, formerly known as the Keddy Mill, covers approximately 60,000 SF of the site and abuts, and actually a portion stands in, the Presumpscot River itself. Decades of industrial use, pulp production, steel fabrication and foundry use, have left significant environmental contamination both in the mill and surrounding the mill near the river bank. A VRAP, Voluntary Response Action Program, for clean up of the site was signed by the ME DEP in November of 2005. The site development costs estimates for site development, demolition, environmental remediation, riverbank restoration and stormwater treatment system totals $3,461,826. Site development, storm water, and riverbank restoration costs are $2,346,825; demolition and environmental cleanup costs are $965,000 and river bank retaining wall cost estimated at $150,000.

The RCDB funds will be used in the site remediation of hazardous contaminants in the mill building and the soils on the watershed and banks of the Presumpscot River. After remediation, site and structural work will be required to restore the river bank and complete the storm water runoff requirements.

Time line – An anticipated June 2009 start date, site remediation, demo and preliminary site work estimated complete May of 2010 with first residential unit construction completion estimated May of 2011.

F. COST ESTIMATES & PROJECT FUNDING

Provide the estimated project cost, amount of RCDB funds to be requested and sources, amounts and dates secured for all anticipated cash and in-kind matching funds. All construction estimates should be prepared by the Engineer/Architect (from section A-3). Take into account the inflation rate in relation to the anticipated starting date of the project as they apply to construction costs.

Total Estimated Project Cost:	$3,461,825	RCDB Request:	$750,000

Funding Source	Amount	Date Secured	Cash or In-Kind
Initial Developer equity	$1,200,000	April 2006	Cash
RCDB program	$750,000		
Add'l Developer equity	$1,511,825		Cash
TOTAL:	**$3,461,825**		

G. Sponsorship of State Agency

Each Letter of Intent submitted for the Riverfront Community Development Bond program must be accompanied by a sponsorship from a State Agency as defined in Section 1(12) of the Final Rule. An authorized official of the State Agency must sign below in order for the Sponsorship to be considered official and for the Letter of Intent to be complete.

By signing this Sponsorship, the State Agency does not assume any responsibility for the implementation or completion of the project and is held harmless from the prosecution of all work and related aspects of RCDB activities. In addition this Sponsorship does not influence project merit or need determination.

Signature of Authorized State Official	State Agency	Date: mm/dd/year

H. Applicant Certifications

The Applicant Certifications must be signed by the applicant community, participating non-profits, developers or other agencies, public or private, which will benefit from RCDB activities and be a participant in the RCDB project. Those entities acting solely as a provider of financial assistance do not need to sign.

a. To the best of my knowledge and belief, the information in this Letter of Intent and all attached documentation is true and correct;

b. This Letter of Intent complies with all applicable State laws and regulations; and

c. Approval of this Letter of Intent by OCD to submit a final application does not imply final project approval or funding.

Applicant Community

Signature of Chief Executive Officer	Name of Community	Date: mm/dd/year

Non Profit Organization

Signature of Chief Executive Officer	Non-Profit Name	Date: mm/dd/year

Developer

	Hudson Realty Capital	09/24/08
Signature of Chief Executive Officer	Company Name	Date: mm/dd/year

Renee Lewis, Managing Director

Instructions and Guideform

A. Eligibility

1. All applicants must complete this section.
2. Complete this section if the applicant will be in partnership with a non-profit, developer, etc. (Additional spaces for information on non-profits, developers, etc. are contained on Page 7 of this Letter of Intent; just complete as needed and attach to Page 1 of your submission.)
3. Complete this section if the applicant has been working with an engineer or architect.
4. All applicants need to indicate the Maine River where the RCDB Project will occur.

B. Eligible Uses

All applicants must complete this section by identifying how RCDB funds will be used. **For a full listing of Ineligible Uses please refer to Page 6 of this Letter of Intent or to Section 3 contained on Pages 5-6 of the RCDB Final Rule.**

C. Eligible Project Sites

All applicants must indicate the type of eligible project site where RCDB activities will occur. **In addition all applicants must attach documentation of ownership or lease to your submission**

D. Demonstrated Capacity of Applicant and RCDB Partners

All applicants must address the required criteria relating to the capacity of the applicant and all partners in the RCDB project. (Use only the space allowed)

E. Project Information

All applicants must describe the proposed project and timeline. (Use only the space allowed)

F. Cost Estimates and Project Funding (Maximum RCDB grant award is $750,000)

All applicants must state the estimated project cost, how much RCDB funding is being sought and the estimated matching funds and whether they are cash or in-kind. **Assurance of full project matching funds is not needed until the full application submission. Please remember that the required match for the RCDB program is 2 dollars of matching funds for each dollar of RCDB funding, with no more than 25% of the matching funds being in-kind. Please refer to Section 6 contained on Page 7 of the RCDB Final Rule for a full definition of Matching Funds Requirements.**

G. Sponsorship of State Agency

Each applicant must have this section signed by an eligible State Agency. Eligible State Agencies are: Maine Department of Conservation, Maine Department of Agriculture, Maine Department of Economic & Community Development, Maine Department of Environmental Protection, Maine Department of Inland Fisheries and Wildlife, Maine Department of Marine Resources, Maine Housing, Maine State Planning Office, Maine Department of Transportation, Maine Historic Preservation Commission, Maine Arts Commission and Bureau of General Services.

H. Applicant Certifications

Each applicant must sign the Applicant Certifications; in addition all participating non-profits, developers or other agencies, public or private, which will benefit from RCDB activities and be a participant in the RCDB project must sign as well

(Additional spaces for certifications by participating entities are contained on Page 7 of this Letter of Intent; just complete and have signed as needed and attach to Page 4 of your submission.)

§ 3. Ineligible Uses

Ineligible uses of the Riverfront Community Development Bond (the Fund) are set forth in this section. The following activities may not be funded by the Riverfront Community Development Bond (the Fund):

1. Construction or repair of bridges or dams, with the exception of the construction or repair of bridges for the primary purpose of walking, or bicycling and is required for walking or bicycling trail connectivity;

2. Planning and Feasibility Studies;

3. Any work related to municipal water, sewer or road projects;

4. Improvements to private residences;

5. Construction of parking garages or decks of any type;

6. Golf Courses;

7. Marinas;

8. On-going maintenance of existing buildings or facilities;

9. Program administration, salaries, lobbying and related expenditures;

10. Repayment of existing debt;

11. Supplanting loan or grant funds from other state or federal programs such as but not limited to, Rural Development, CDBG, EDA, EPA or revenue bonds already approved by the municipality.

12. Any project that damages a river or its riparian habitat or that violates any state or federal environmental laws or regulations; and

13. A project otherwise required by any regulatory license of permit condition or any form of mandated mitigation or remediation activity.

2. Applying on Behalf or Partnering with Sub-Grantee: (e.g.: Non-Profit, Developer, etc.)

Sub-Grantee:		Phone:	
Address:		Fax:	
City, ZIP:		E-Mail:	
Agency Rep:		Title	

2. Applying on Behalf or Partnering with Sub-Grantee: (e.g.: Non-Profit, Developer, etc.)

Sub-Grantee:		Phone:	
Address:		Fax:	
City, ZIP:		E-Mail:	
Agency Rep:		Title	

2. Applying on Behalf or Partnering with Sub-Grantee: (e.g.: Non-Profit, Developer, etc.)

Sub-Grantee:		Phone:	
Address:		Fax:	
City, ZIP:		E-Mail:	
Agency Rep:		Title	

H. Applicant Certifications

Non Profit Organization

Signature of Chief Executive Officer	Non-Profit Name	Date: mm/dd/yea

Non Profit Organization

Signature of Chief Executive Officer	Non-Profit Name	Date: mm/dd/yea

Non Profit Organization

Signature of Chief Executive Officer	Non-Profit Name	Date: mm/dd/year

Developer

Signature of Chief Executive Officer	Company Name	Date: mm/dd/year

Maine Department of Environmental Protection

Maine Voluntary Response Action Program

Application for Assistance

Please complete this application to request technical assistance from the Voluntary Remedial Action Plan Program (VRAP) pursuant to Title 38 MRSA, Section 342, Subsection 15.

General Site Information

Property name: Former Depot Energy Company

Street Address: 13 Depot Street

City (or Township): Windham

Tax map #: 38 Lot #: 6

Latitude: 43° 44' 08" N Longitude: 70° 25' 25" W

Total Acreage of Property (all parcels): 1 acre

Property Description Recorded at Registry of Deeds

County: Cumberland Book: 1681 Page: 99

Applicant Information

Applicant/Organization*: Little Falls Village, LLC

Contact Person: Renee Lewis Title: Primary contact

Address: c/o Quinlan & 50 Monument Square

City: Portland State: ME Zip: 04101

Phone: 772-7219 Fax: 772-7011

*The applicant is the individual or organization that will be the recipient of any applicable administrative or liability assurances provided by VRAP. The applicant is also responsible for payment of fees for Department review and oversight costs.

VIL_RESP01122

HRC004030

Current property owner (if different than applicant)

Name: Joseph Kittrell Title: _____

Organization: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Applicant's interest in the property

____ Current Owner ____ Mortgagee Interest

____ Rent or lease ____ Other: _____

____ Potential Buyer

Involvement with other regulatory programs

____ Yes

____ None known

If yes, list the program/contact person from the Department: _____

_____

Contact person(s)

Please list the name(s) of your current environmental consultant and legal counsel.

Consultant: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Attorney: _____ of _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Certification

I hereby make a request of VRAP to assist me and the company/organization I represent in determining whether the above-described property has been the site of a release or threatened release of a hazardous substance, hazardous waste, hazardous matter, special waste, pollutant or contaminant, including petroleum products or by-products. I understand this assistance may include the review of agency records and files, and review and approval of my investigation plans and reports as well as remedial action plans and implementation.

I am aware that VRAP, at its discretion, may contact municipal officials regarding investigation/remedial actions at sites participating in the program.

I am aware that I must reimburse VRAP for the costs of providing this assistance. I understand that reimbursement requests may be made on a periodic basis and that failure to reimburse VRAP for costs in a timely manner may result in disqualification from VRAP.

Typed/printed name:_____ Title:_____

Signature:_____ Date:_____

Revised 12/23/2002

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
ACTING COMMISSIONER

August 26, 2011

Village at Little Falls, LLC
c/o Renee Lewis
2 Market Street, 6th Floor
Portland, Maine 04101

RE: Keddy Mill, Windham

Dear Ms. Lewis:

I am writing to determine if Village at Little Falls, LLC ("Little Falls") intends to continue participating in the Maine Department of Environmental Protection's (the Department's) Voluntary Response Action Program ("VRAP") in light of recent sample results for polychlorinated biphenyls (PCB) at the Keddy Mill Site.

As you know, on November 9, 2005 the Department issue Little Falls a No Action Assurance Letter ("NAA" - attached) under our VRAP , contingency upon Little Falls completing certain remedial actions at the Keddy Mill site in Windham. The site, which you own, is located at 7 Depot Street, South Windham, Maine, and is identified as lots 6, 7 & 8 on Tax Map 38 in the Town of Windham. We appreciate the actions that Little Falls has taken to date in cooperation with the Town of Windham and Department to facilitate clean-up of this site. However, we recently received the final report for PCB sampling from Summit Environmental titled "Supplemental Sampling, April, 2011", which was conducted with funding from the Town of Windham's Brownfields Assessment Grant. The report shows that the PCB contamination at your Keddy Mill property is more widespread than anticipated, and therefore the clean-up will be much more expensive. At this time we are asking if you intend to continue with the clean-up under VRAP or if we should terminate the NAA and move the site into the Department's Uncontrolled Hazardous Substance Sites Program ("Uncontrolled Sites Program") for further remedial action.

As you make your decision, please be aware that under the Uncontrolled Sites Program, as the owner of the Keddy Mill you are a Responsible Party, as defined in 38 MRSA § 1362 (2), which under 38 MRSA § 1366 is jointly and severally liable for remediation costs that the Uncontrolled Sites Program might incur at this site. Further, while the property itself is industrial and access has been restricted by the fence that you voluntarily installed, the site is surrounded by residential properties and the Uncontrolled Sites Program would likely find that the site represents a threat to public health and the environment that needs further response action.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

web site: www.maine.gov/dep

Based on the investigations conducted it has been shown that PCBs have impacted the concrete structure and shallow soils at the property. The above referenced report recommends that a Remedial Investigation be completed at this site and the Department concurs that this is the next logical step.

If you intend to continue taking action in the VRAP under the NAA, please signal your continued participation by submitting to the Department's VRAP, for its review and approval, a Remedial Investigation plan and schedule (RI plan) by September 30, 2011. The RI plan must meet the requirements of the VRAP and the federal EPA Toxics Substance Control Act program for PCBs. If a complete RI plan is not received by September 30, 2011, then the Department will notify you that we have terminated the NAA, and have referred the site to the Uncontrolled Sites Program for further action.

If you have any questions regarding this letter, do not hesitate to contact me at 207-446-4366, or your VRAP project manager Laura Gay at 207-287-7746.

Sincerely,

David Wright

David Wright, Director
Division of Remediation
Bureau of Remediation and Waste Management

Enclosure

cc: (w/o enclosure)
Laura L. Gay, MEDEP
Ron Dyer, MEDEP
Tom Bartell, Town of Windham
John Cressey, Summit Environmental
Todd Coffin, GEI

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

FILE COPY

DAWN R. GALLAGHER
COMMISSIONER

November 9, 2005

Village at Little Falls, LLC
c/o Renee Lewis
2 Market Street, 6th Floor
Portland, Maine 04101

Re: Village at Little Falls Property, 7 & 13 Depot Street, South Windham, Maine-Voluntary Response Action Program No Action Assurance Letter

Ms. Lewis:

The Maine Department of Environmental Protection ("Department") has received and reviewed your application to the Department's Voluntary Response Action Program ("VRAP"), along with the environmental site assessment reports submitted by your environmental consultant for the project, Ransom Environmental Consultants, Inc. ("Ransom"). The application was submitted to the Department with the request that Village at Little Falls, LLC and Lumis, Inc., as applicants to the VRAP, receive the protections provided by the VRAP Law.

Based on the information presented in the reports, the Department agrees with the conclusions and recommendations for further actions at the property. The remedial actions include provisions for the excavation and disposal of petroleum and polychlorinated biphenyl ("PCB") contaminated soils, as well as the appropriate encapsulation of some of the PCB contaminated soils as described in the "Voluntary Response Action Plan for Village at Little Falls, LLC, South Windham, Maine", authored by Ransom and dated June 8, 2005.

The Department's concurrence with the proposed actions is conditioned on the prohibition of installation of groundwater extraction wells on the property without the permission of the Department.

Provided that the remedial actions are completed to the satisfaction of the Department, Village at Little Falls, LLC, Lumis, Inc., and their successors and/or assigns will be granted the liability protection provided by 38 M.R.S.A. §343-E(1) for the property located at 7 and 13 Depot Street, identified as Lots 6, 7 and 8 on Windham Tax Map 38, and described in Book 1681, Page 99, and Book 18046, Page 32 of the Cumberland

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
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(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

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1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769
(207) 764-0477 FAX: 764-1507

web site: www.maine.gov/dep

County Registry of Deeds. The Department will take no action against Village at Little Falls, LLC, Lumis, Inc., and those persons identified in 38 M.R.S.A. § 343-E(6).

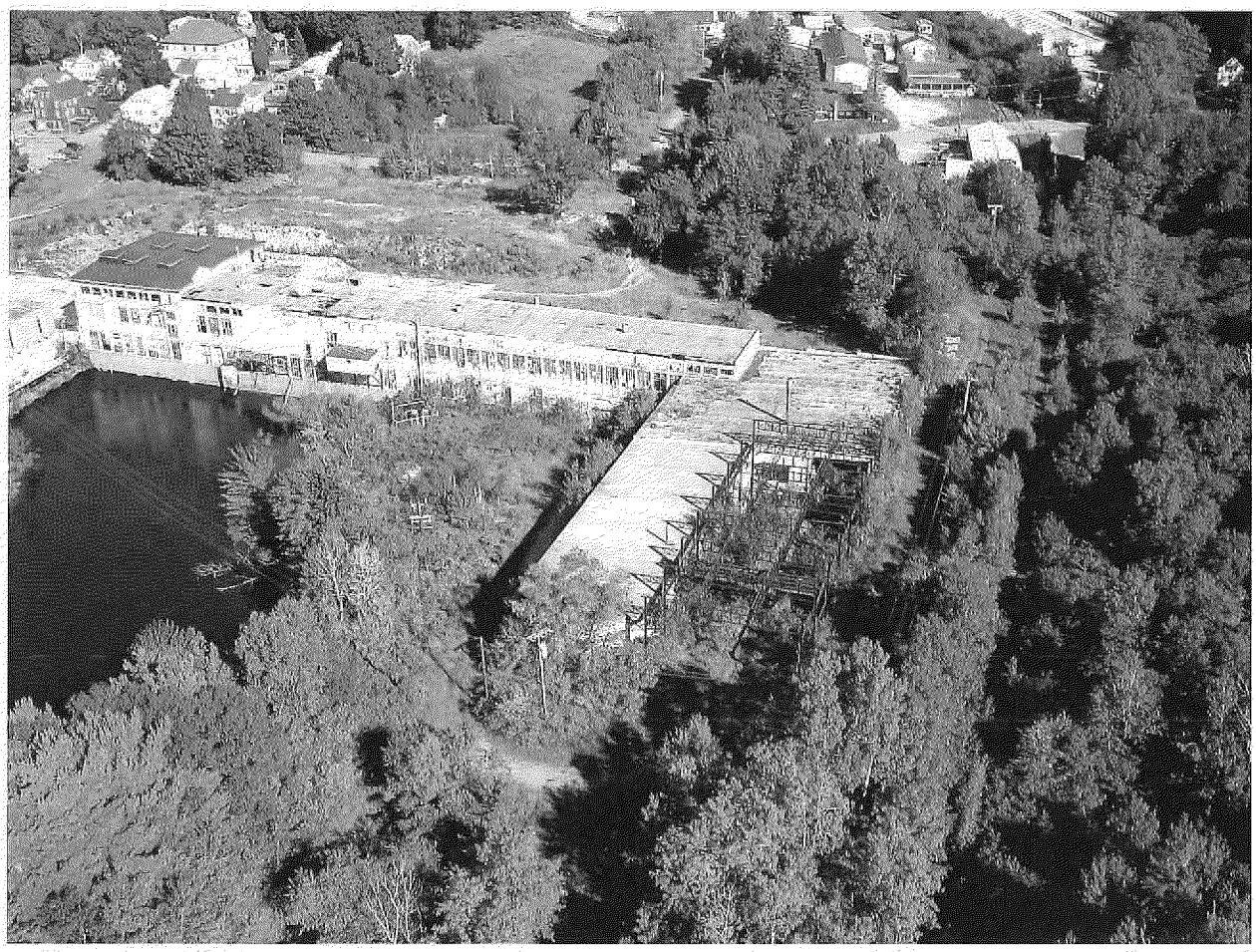
Once the recommended remedial measures to be implemented at the property are completed, a report demonstrating the successful implementation of the tasks should be forwarded to the VRAP. Upon determining successful conclusion of the remedial tasks, the Department will issue to Village at Little Falls, LLC and Lumis, Inc. a Commissioner's Certificate of Completion.

If you have any questions regarding this letter, please feel free to call me at 207-287-4854.

Sincerely,

Nicholas J. Hodgkins
Division of Remediation
Bureau of Remediation & Waste Management

Pc: D. Todd Coffin, Ransom
Jon Woodard, Maine DEP



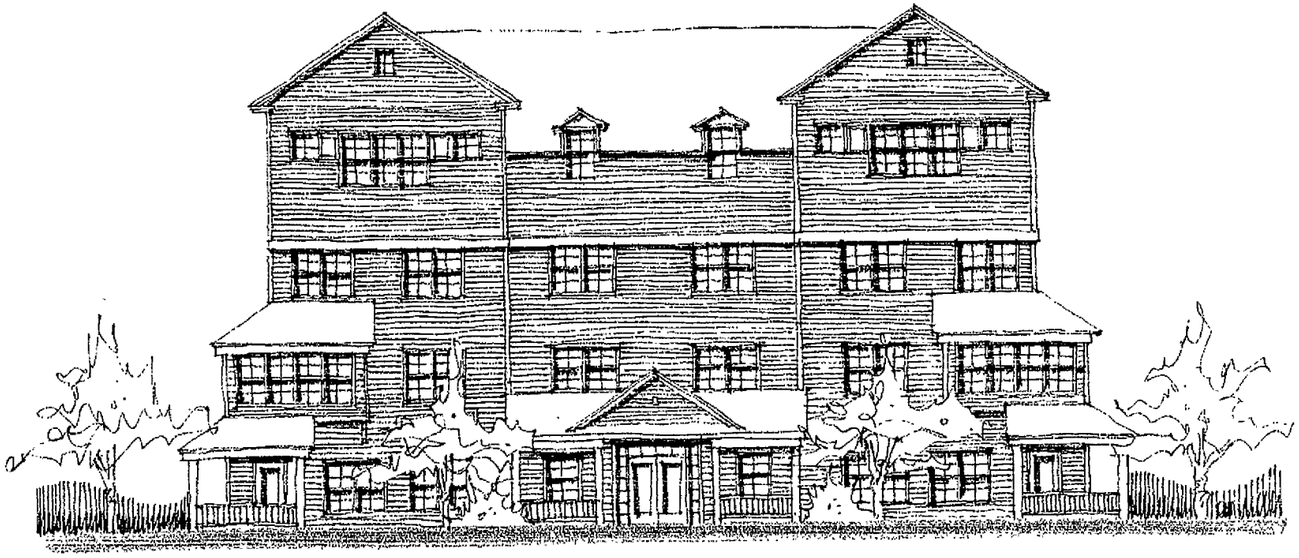
VILLAGE AT LITTLE FALLS

CONTRACT ZONING PROPOSAL

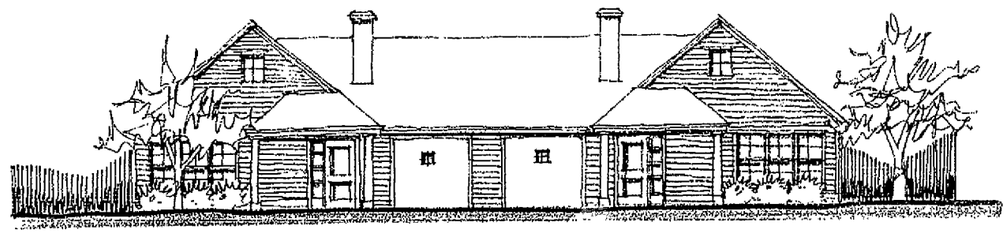
Village at Little Falls, LLC
c/o Renee Lewis, Manager
2 Market Street, 6th Floor
Portland, Maine 04101
772-7219

South Windham Housing Corporation
c/o AVESTA Housing
307 Cumberland Avenue
Portland, Maine 04101
553-7780

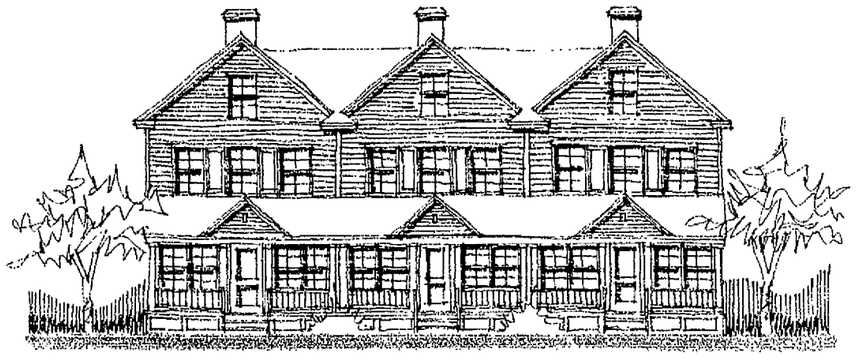
March 28, 2005



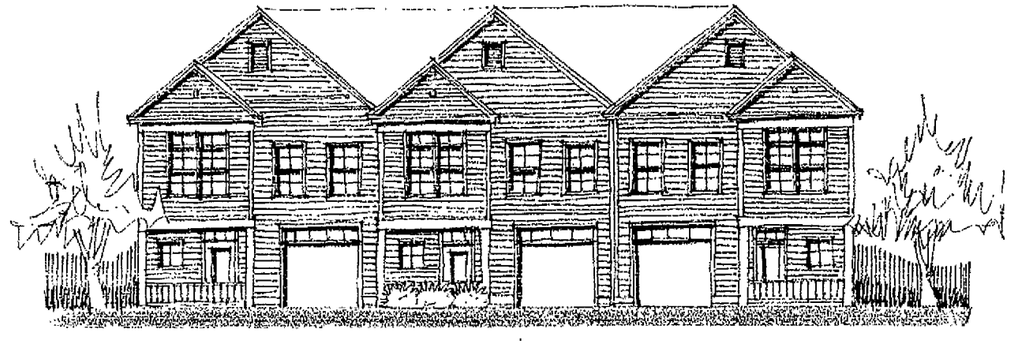
Proposed Building 'A' Front Elevation-Apartments
1/8" = 1'-0" scale



Proposed Building 'B' Front Elevation-Duplexes
1/8" = 1'-0" scale



Proposed Building 'C' Front Elevation-Porch Units
1/8" = 1'-0" scale



Proposed Building 'D' Front Elevation-Townhouses
1/8" = 1'-0" scale

VILLAGE AT LITTLE FALLS

South Windham, Maine

Proposed Building Elevations

VIL_RESP01130

Prepared For Questor

GAWRON TURGEON ARCHITECTS

WINDHAM TOWN COUNCIL
MINUTES

Windham Community Center
Council Chambers
April 12, 2005 – 7:00 p.m.

I. Roll Call of Members.

Present: Thomas Bartell, David Ennis, Robert Muir, Michael Shaughnessy, David Tobin and Elizabeth Wisecup. Absent: Lloyd Bennett

II. Pledge of Allegiance.

III. Minutes of Council Meeting of March 22, 2005 and Special Meeting of April 5, 2005.

Thomas B:
Moves to accept the minutes of March 22, 2005 and Special Meeting of April 5, 2005, 2nd by David T.

David E:
In the minutes of March 22, 2005, on page 13, it should read Findings of Fact.

Vote 5-0 with 1 abstention (M.S.)

IV. Public Participation.

The public is invited to address the Council on any item of business not on the agenda for tonight's meeting.

None

V. Council Participation.
None

VI. Committee Reports.
None

VII. Town Manager's Report.

Tony Plante:
In the budget report schedule, we have one change. It is 1160, Cable Television, and we will reschedule it to May 10th. I have updated the spreadsheet but I do not have new ones for you tonight. The Library was left off the spreadsheet, and I have added it and it is scheduled for May 3rd.

You also received copies of the audit for the fiscal year ending June 30, 2004. Clearly with the turnover in the Finance Director's position it had created some issues for us in getting any number of things done, and the audit was one of them. Another reason why it is late is the GASB-34 requirements.

I gave you a copy of a letter from residents on Hall Road and Harding Drive. Hall Road is one of the few gravel roads still left in town, and they are asking about having the road paved. I can say that it has been our practice over the last number of years, for the most part, to focus our efforts on maintaining the roads that are already paved, and improving their condition. We have gone through two pavement condition rating surveys to assess the conditions of our roads and to try and improve those with the help of the $3,000,000 that the voters approved in 2000. There have been some instances where we have extended paving, or have paved short stretches of gravel road, but we have a fairly sizable portion here and one where the right-of-way would need additional work. I have talked with our Public Works Director, Doug Fortier, and to do it right would involve more than simply paving over what is there.

We were also notified last week by telephone, and with letters that will follow to property owners abutting the Maritimes and Northeast Natural Gas Transmission Pipeline that Maritimes and Northeast is planning an expansion of their system mainly as a result of a location of a compressor station in Westbrook. The location of this compressor station will require a 2 mile loop in Windham, and it will stay within the existing right-of-way, though they will still have to go through the entire permitting process just as they did last time when it was first installed. We can expect to be hearing more about that during the next couple of years.

David E:

Is it correct that Hall Road is actually a town Road?

Tony Plante:

Yes it is.

David E:

We have maybe a half dozen town roads that are still gravel. After that signed request had come in our packets I received a call from some folks on another gravel road, and they asked me the question of what we had been doing for gravel roads. My reply was that we had been concentrating on our paved roads in town, and we have invested quite a bit of money rebuilding some, and overlaying a lot of others. The question was posed to me that rather than grading some of these gravel roads do we go out and spend any considerable time and resources on maintaining them with layers of gravel that can be packed and then graded? Some of those roads have been graded so much without any materials being added, we simply cannot grade them anymore. I did not have a response to that. I am not interested in going out and paving all the dirt roads in town, but I am definitely interested in making sure the town invest what it needs to maintain the gravel roads that we have.

Tony Plante:

I do not know that we do not do that, but I know there have been times when we have hauled gravel in. We have a budget workshop with Public Works next week, and I think it would be a perfect opportunity to talk about something like that.

Liz W:

In that letter they stated that they were promised that it would be paved within 2 to 5 years, and it has been 6. That would not have been something the town would have given them. Do you think the developer might have suggested it?

Tony Plante:

I have no idea. I cannot sit here and say that absolutely no one from the town would ever had said those words because I do not know who they talked to, but whoever made the representation to them, if that was the case, whether it was the developer, contractor, or someone who worked for the town had no authority to obligate the town. That is a decision that has to be made.

David E:

I can clarify what was said in this room in this formal setting many times while that developer was working on that project. "It is a dirt road, and it will probably be a dirt road for a very long time, and if word gets out that it will be paved, chances are it never will be paved, and you better be sure you tell the people who buy that property that they know it is dirt, and it probably always will be dirt". That was said over, and over.

Tony Plante:

Where Harding Drive joins Hall Road, at one point, was considered abandoned or discontinued. The developer approached the Council and persuaded the Council to declare that the road had not been abandoned by presumption, and that it was still in fact a town road so he could go in and improve it. Hall Road today, where it intersects with Windham Center Road, is fairly wide and has a decent approach apron even though it is mostly gravel. Then it narrows down to what Hall Road was before, and when you get down to the section that the developer had to improve; which had not previously been used, and had been considered abandoned by presumption, though the Council was convinced to declare that it had not been, is wider and improved, so it is that whole middle section that the town would then have to go in, and basically do the same thing the developer did, have it surveyed, have the engineering done, and build a new Hall Road in place of the one that there is there. It is not that it is not possible, clearly contractors can do it, public works can do it, the question is whether that's the direction the town wants to go, and do we understand what the implications are for other gravel roads.

Daniel Keene:

I live on Keene Road which is a gravel road. I think last year the town may have put some regrind on that road, and as far as I can see it is the best thing that ever was done to that road, while it still needs maintenance and grading the road is in better shape this spring than I have ever seen it.

VIII. PUBLIC HEARINGS.

None.

IX. UNFINISHED BUSINESS & GENERAL ORDERS.

05-42 To act on an order to approve an application submitted by Shaw Enterprises, Inc. d/b/a Getty Autowash for a victualer's license. (Postponed from 3/22/05 meeting at request of applicant.)

Liz W:

Moves to postpone article 05-42 to May 24, 2005 per request of the applicant, 2nd by Tom B.

Vote 6-0

05-47 To act on an order to approve an application submitted by Peter G. Gouzie d/b/a Gouzie's Variety for a victualer's license.

David E:

Moves for this article, 2nd by Tom B.

Vote 6-0

05-48 To act on an order to grant a blanket letter of approval to the Lake Region Eagles #4342 for a license to operate a Game of Chance.

David E:

Moves for this article, and to make the blanket letter of approval valid from April 12, 2005 to April 12, 2006, 2nd by Mike S.

Vote 6-0

05-49 To act on an order to approve an application submitted by Rana Enterprises d/b/a Pat's Pizza for a renewal liquor license.

Tom B:

Moves for this article, 2nd by David E.

Vote 6-0

05-50 To act on an order to approve the Council Appointments Committee's nomination for dedication of the 2004 Town Report.

Liz W:

Moves to nominate Kay Whirlwind-Soldier as the nominee submitted by the Committee, 2nd by David E.

Liz W:

The person who wrote the nomination letter knows Kay fairly well, and it listed many of the things that she has done for the town. In my personal opinion she is a very good ambassador for the Town of Windham. She is always promoting Windham, whether it is in articles, doing work with senior citizens, or working for the Historical Society. She went out and had large pictures of Windham made up for some of the new businesses in Windham, and she did not charge a fee for that, they sent a donation to the Historical Society. She is a promoter of Windham, and I wish I could read the letter because it was very eloquently written, and I would support this nomination whole heartedly.

Tom B:

I have worked with Kay on a number of projects, and she has been tireless in her dedication to the Town of Windham, and she is very worthy of this.

Liz W:

Normally, Kay is the one who writes up these dedications, and I was wondering if the person who wrote this letter, who did such a wonderful job, might write the dedication so Kay does not have to write her own?

Vote 6-0

05-51 To act on an order to authorize the purchase of electronic accountability system equipment for the Fire-Rescue Department from Grace Industries of Owings, Maryland in the amount of $82,091, said purchase to be made from Homeland Security Grant funds.

Tom B:

Moves for this article, 2nd by David T.

David E:

I will vote for this, but this is the kind of expenditure that does not pass the straight face test. To think that Windham, Maine is a priority in our Homeland Security is laughable. You would think it would be designed to protect the harbors of the state, the borders of the state, and perhaps increase the security of the propane tanks at Downeast Energy. I will vote for it, because if Windham does not pick up this $82,091 somebody else will for a similar type of electronic device. If you want to know what is wrong with our system, this is a perfect example. Dolling out money because it is available, and we are going to accept it because it is available to us and we are not going to turn it down, but we should be ashamed that we are going to accept it, and the Federal Government should be ashamed that they will allow us to take it.

Vote 6-0

05-52 To act on an order to authorize the Portland Water District to proceed with the engineering design and solicitation of bids to construct the Little Falls Wastewater Conveyance System and issue temporary financing for the engineering work, all subject to the following limitations: The engineering cost may not exceed $300,000; if the project is not under construction within five (5) years the Town of Windham will reimburse to the Portland Water District the actual cost of the engineering work completed to date up to an amount not to exceed $150,000; initiation of the construction phase will require additional approval by both the Town of Gorham and the Town of Windham.

Tom B:

Moves for this article, 2nd by David T.

Liz W:

If it should be the PWD's desire not to proceed with the project, would we have to reimburse them?